

**KNOWLEDGE AND INFORMATION- A LEGAL COHESION FROM THE
PERSPECTIVE OF THE RIGHT TO INFORMATION ACT, 2005.**

Name of Authors: I) Professor (Dr.) Abhijit Bhattacharjee, II) Sakyasuddha Sarkar

Designation and Institutional Affiliation of 1st Author: PRINCIPAL, JALPAIGURI LAW
COLLEGE, UNIVERSITY OF NORTH BENGAL.

Contact details of 1st Author: COLLEGE PARA, P.S. - KOTWALI, P.O.-JALPAIGURI, Dist. -
JALPAIGURI, Pin-735101, State- WEST BENGAL, Country- INDIA.

Educational Qualification of 2nd Author- B.A. (HONS.) LL.B, LL.M, UGC NET, WEST
BENGAL SET.

Contact details of 2nd Author: BEGUNTARY, P.S. - KOTWALI, P.O.-JALPAIGURI, Dist. -
JALPAIGURI, Pin-735101, State- WEST BENGAL, Country- INDIA.

Abstract

Information plays the most vital role in the advancement of human civilization and it is truer in the present-day context, which is popularly known as the information age. The decay and the subsequent abolition of colonial rule, leads to the creation of liberal democracy, almost across the globe. This necessitates the legal recognition of the right to information because, without true and proper information, a democracy will not be a fruitful exercise, at least from the perspective of the citizens. The sincere attempts to secure proper dissemination of information, especially information pertaining to government activities, are being made across the world and the Right to Information Act, 2005 is the Indian answer. The approach of the Indian Judiciary to this issue clearly manifests a trend to treat information as a tool for the formation of knowledge and opinion

and it is the Indian Judiciary which made it abundantly clear in several judgments, specifically by prescribing standards to evaluate the discourse on the right to information in the context of the right to privacy and the Indian Constitution. Hence a more pragmatic and holistic approach is required in the realm of the Right to Information Act, 2005, to connect this statute and the concomitant discourse on information, to the issue of knowledge formation, in order to squeeze the most from this right-conferring statute.

Keywords: 1) Right to Information, 2) Perception, knowledge and information, 3) Right to privacy, 4) Judicial stance on right to information, 5) Information and formation of knowledge.

I) INTRODUCTION

Knowledge is plausibly the single most important element, responsible for the refinement of both social and political institutions connected with human civilization. But the issue of knowledge is, at the outset, connected to the concept of information. Thus, it is the data, as an integral part of information that plays the most pivotal part in the formation of knowledge.

In the beginning, the source of data was limited basically to sensory data, collected by using the human senses. But with the advancement of human civilization, several specialized disciplines arose, which made unfeigned attempts to realize some structured methods of collecting data, which in turn can help in the formation of a knowledge system. These attempts provide the human race a unique opportunity to interpret data with the help of cognitive abilities, based on the pre-formed

disciplines pertaining to knowledge. It is this knowledge, which fortunately possesses a cascading effect within its fold, which altered almost single-handedly, the entire spectrum of data and information system and the interrelation thereto. The maturity of scientific adventures, which are in direct correlation with the advent of scientific tools, made the issue of data collection a more comprehensive and susceptible exercise.

But apart from the domain of science, the issue of knowledge became a matter of question and debate in the domain of philosophy. This is directly connected with the issue of politico-legal discourse, in a substantial manner. It is truer after the introduction of democracy in the modern legal domain,¹ because the issue of knowledge is linked directly with the issue of choice in a democratic set-up and it is truer in the era of liberal economy.

The issue and the interrelation between data, information and knowledge is of labyrinth in nature, because without the intervention of human intelligence, the combination of data and information will be in jeopardy.

Apparently, this perception of knowledge is unconnected with law as a discipline, but having proper and trustworthy information is an important tool, required for maintaining a mature democracy and the Right to Information Act, 2005² precisely tries to cater for this aspect.³

¹ Dr. Dillip Kumar Mahapatra, Dr Dhaneswari Jena, *Right to Information Act:-A Democratic Weapon*, Volume 22, Issue 7, Ver. 7 IOSR JOURNAL OF HUMANITIES AND SOCIAL SCIENCE (IOSR-JHSS) 58, 58 (2017).

² The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

³ Rashmita Bishi, *Right To Information Act*, Volume 13, Issue 2 INTERNATIONAL JOURNAL OF CREATIVE RESEARCH THOUGHTS (IJCRT) a610, a610 (2025).

Before entering into the discussion regarding the interrelation between the Right to Information Act, 2005⁴, data and knowledge, the element of privacy must be taken into cognizance.

In common parlance, the concept of privacy is directly connected with the freedom from constant observation. This indicates the right to be alone. But this right or freedom to be alone gives rise to the issue of privation of information.

Hence the issue of privacy and the right to get information ostensibly stands diametrically in the opposite quarters.

II) DATA, KNOWLEDGE AND RIGHT TO INFORMATION

The term knowledge, within its fold, contains several elements, those inter alia are, acquaintance or awareness about something, which can include any technicalities of a discipline like science, arts etc.⁵

Mostly on the same line of argument, as per the Cambridge Dictionary, knowledge means the attribute of familiarity with something.⁶

These dictionary meanings indicate the insufficiency of the definition of the term 'knowledge', because, in effect, all these definitions lead to the facet of 'knowing' and hence it makes a full circle without furnishing any concrete idea.

⁴ The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

⁵ MERRIAM-WEBSTER, <https://www.merriam-webster.com/dictionary/knowledge> (last visited on May 18, 2025).

⁶ CAMBRIDGE DICTIONARY, <https://dictionary.cambridge.org/dictionary/english/knowledge> (last visited on May 21, 2025).

Surprisingly, the Webster Dictionary pointed out that data simply means ‘information’.⁷ At the same time, the same dictionary put the term ‘knowledge’ within the fold of the term ‘information’.⁸

The inference is that data, information and knowledge are the elements of the same attribution and that attribution leads to the formation of qualitative perception by using quantitative tools, like data and information.

It is intriguing to note that the National Institute of Standards and Technology, which belongs to the Department of Commerce, Government of the United States of America (USA), includes the element of communication within the ambit of the term ‘information’.⁹

This clearly suggests the idea of dissemination of data, in the discourse of knowledge and information.¹⁰

But this entire approach fails to appreciate the abstraction of social sciences in general, and in particular, this approach does not take into cognizance the abstract concepts of law as to the interrelation between knowledge and information because, only by using data as a tool, it is possible to arrive at the abstract ideas of law.

It is intriguing to note that the Freedom of Information Act, 1967 (FOIA) of the United States of America (USA) allows an individual to get information from government agencies. Under this enactment, every agency of the government of the United States of America (USA) is under an

⁷ MERRIAM-WEBSTER, <https://www.merriam-webster.com/dictionary/data> (last visited on May 21, 2025).

⁸ MERRIAM-WEBSTER, <https://www.merriam-webster.com/thesaurus/data> (last visited on May 21, 2025).

⁹ NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY, DEPARTMENT OF COMMERCE, GOVERNMENT OF THE UNITED STATES OF AMERICA, <https://csrc.nist.gov/glossary/term/information> (last visited on May 23, 2025).

¹⁰ See also Takano v. SEBI, 2022 SCC OnLine SC 210, Supreme Court of India v. Subhash Chandra Agarwal, (2020) 5 SCC 481, DAV College Trust and Managing Society v Director of Public Instructions, (2019) 9 SCC 185.

obligation to provide information, if asked so by any person.¹¹ But at the same time, it must be remembered that this enactment does not envisage any separate body/agency for the dissemination of information. Hence each agency/department is under an obligation to provide the requisite information on demand, on the payment of certain charges.¹²

This Freedom of Information Act, 1967 (FOIA) also provides nine exceptions, i.e. on these grounds, a piece of information can be denied. Those grounds are inter alia, national security, privacy, information pertaining to financial institutions, commercial or proprietary data etc.¹³

Hence, this statute takes a data-centric approach, regarding dissemination of information. The reason can be attributed to the absence of a separate body for the dissemination of information, unlike its Indian counterpart, which prescribes the establishment of the Central Information Commission¹⁴ and the State Information Commission(s).¹⁵

In this regard, the Privacy Act, 1974 of the United States of America (USA) shall not be kept outside the discussion. It is pertinent to note that, this enactment on an unequivocal term subjected itself to the Freedom of Information Act, 1967 (FOIA). The Privacy Act, 1974 indeed provides that, the information and the dissemination of the same, if required by the Freedom of Information

¹¹ UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, GOVERNMENT OF THE UNITED STATES OF AMERICA, <https://www.epa.gov/foia> (last visited on May 21, 2025).

¹² FREEDOM OF INFORMATION ACT (FOIA), THE WHITE HOUSE, https://www.whitehouse.gov/omb/information-resources/freedom-of-information-act-foia/#_Freedom_of_Information (last visited on May 25, 2025).

¹³ *Supra* note 12.

¹⁴ The Right to Information Act, 2005, § 12, 13, 14, NO.22, Act of Parliament, 2005 (India).

¹⁵ The Right to Information Act, 2005, § 15, 16, 17, NO.22, Act of Parliament, 2005 (India).

Act, 1967 (FOIA) shall have an overriding effect, notwithstanding the provisions of the Privacy Act, 1974.¹⁶

This clearly suggests the admixture of both right-based jurisprudence (in clear contrast with need-based jurisprudence) and data-centric/data-oriented approach in the prevalent legal fabric of the United States of America (USA).

However, it is pertinent to note that, this overriding effect of the Freedom of Information Act, 1967 (FOIA) over the Privacy Act, 1974, points out the overwhelming supremacy of the discourse on the right to information, even at the cost of privacy.

But in contrast with the California Privacy Act, which is, according to Forbes, the most comprehensive privacy protection law in the entire United States of America (USA),¹⁷ a legal conundrum surfaced in the legal regime of the United States of America (USA) as the federal enactment put the right to information on a higher pedestal, in the comparative degree with that of the right to privacy, which may cause to surface a legal conundrum within the self-same legal fabric.

¹⁶ OFFICE OF PRIVACY AND CIVIL LIBERTIES, U.S. DEPARTMENT OF JUSTICE, <https://www.justice.gov/opcl/overview-privacy-act-1974-2020-edition/access#PA&FOIA> (last visited on May 25, 2025). See also, *Greentree v. U.S. Customs Serv.*, 674 F.2d 74, 76, (D.C. Cir. 1982), *DOJ v. Reporters Comm. for Freedom of the Press*, 489 U.S. 749, 773 (1989), *Burton v. Wolf*, 803 F. App'x 120, 122 (9th Cir. 2020), *Shapiro v. DEA*, 762 F.2d 611, 612 (7th Cir. 1985).

¹⁷ Conor Murray, *U.S. Data Privacy Protection Laws: A Comprehensive Guide*, FORBES (last visited on June 2, 2025, 8.16 PM), <https://www.forbes.com/sites/conormurray/2023/04/21/us-data-privacy-protection-laws-a-comprehensive-guide/>

On the other hand, mostly on the same line with the United States of America (USA), the United Kingdom (UK) enacted, in the year 2000, the Freedom of Information Act.¹⁸ Now according to Sec.10 of this Act,¹⁹ every requested information must be provided within 20 working days, from the date of the request. But this right is also not unbridled. Part- II of this enactment, which run from Sec. 21 to 44,²⁰ provides a plethora of exemptions, which include but are not limited to defence, national security, and even health and environmental information etc.

Specifically, the two last-mentioned exemptions, jeopardize, if not entirely, but up to a considerable extent, the right-based jurisprudential approach, in the arena of right to information, particularly in the context of modern environmental jurisprudence and this is a glaring setback in the solemn attempt to strengthen the element of participative democracy,²¹ even in a country having a mature democracy like England.

In contrast, the Indian counterpart, i.e. the Right to Information Act, 2005²² manifestly projected towards the perseverance of democratic temperament in India in a spectrum convoluted with many conflicting interests across the spectrum.²³

¹⁸ NATIONAL ARCHIVES, DEPARTMENT FOR DIGITAL, CULTURE, MEDIA AND SPORT, HM GOVERNMENT, <https://www.legislation.gov.uk/ukpga/2000/36/contents> (last visited on June 5, 2025, 7.00 PM).

¹⁹ NATIONAL ARCHIVES, DEPARTMENT FOR DIGITAL, CULTURE, MEDIA AND SPORT, HM GOVERNMENT, <https://www.legislation.gov.uk/ukpga/2000/36/section/10> (last visited on June 5, 2025, 7.45 PM).

²⁰ NATIONAL ARCHIVES, DEPARTMENT FOR DIGITAL, CULTURE, MEDIA AND SPORT, HM GOVERNMENT, <https://www.legislation.gov.uk/ukpga/2000/36/part/II> (last visited on June 5, 2025, 8.00 PM).

²¹ Swati Shikha, *Role of the right to information (RTI) in promoting democratic accountability: A two-decade review*, Vol. 7, Issue 4, Part D INT J POLITICAL SCI GOVERNANCE 320,324 (2025)

²² The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

²³ Dr. KRISHNA PAL MALIK, RIGHT TO INFORMATION & PROTECTION OF WHISTLEBLOWERS 52 (3rd ed. Allahabad Law Agency 2022).

In consonance with this approach, Sec.2 (f) of the Right to Information Act, 2005,²⁴ while defining the term 'information', includes within its fold, all kinds and types of data (like records, documents, circulars, press releases, advice, contracts, models, samples etc.) including information about private bodies.

On this line, Sec. 2 (j) of the Right to Information Act, 2005²⁵ provides the definition of the term 'right to information' as the right to get/access information from the public authorities, by the way of inspection of records, taking notes etc. Along with this, the term 'right to information' includes the right to get certified copies of the relevant documents pertaining to the relevant piece of information.

This right to get information became fortified by Sec. 3 of his Act,²⁶ which on unequivocal terms, declares that every citizen of this country has a right to get information.²⁷

This approach of the Right to Information Act, 2005,²⁸ notwithstanding the exemptions envisaged under Sec. 8 of this Act²⁹, suggests a more right-centric approach, at least in comparison with its British counterpart.³⁰ Apart from this, the underlying essence of this Act, marks the steady march of the Indian legal discourse, from the colonial approach of secrecy regarding government information to a more holistic and mature democratic structure.³¹ Though the spectrum became

²⁴ The Right to Information Act, 2005, § 2(f), NO.22, Act of Parliament, 2005 (India).

²⁵ The Right to Information Act, 2005, § 2(j), NO.22, Act of Parliament, 2005 (India).

²⁶ The Right to Information Act, 2005, § 3, NO.22, Act of Parliament, 2005 (India).

²⁷ See *CBSE v. Aditya Bandhopadhyay*, (2011) 8 SCC 497, *Union of India v. R.S. Khan*, AIR 2011 Delhi 50.

²⁸ The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

²⁹ The Right to Information Act, 2005, § 8, NO.22, Act of Parliament, 2005 (India).

³⁰ *Supra* note 20.

³¹ See *Bihar Public Service Commission v. Saiyed Hussain Abbas Rizwi*, (2012) 13 SCC 61, *Hardev Arya v. Chief Manager (PIO)*, AIR 2013 Raj 97.

convoluted with the presence of the Official Secrets Act, 1923,³² which manifest purely a colonial attitude and it can be humbly submitted that this last-mentioned enactment is almost irreconcilable with that of the growing right-based jurisprudence in the Indian legal realm and the Right to Information Act, 2005³³ is not an exception.

III) RIGHT TO INFORMATION ACT, 2005 IN THE CONTEXT OF THE INDIAN CONSTITUTION

Art. 19 (1) (a) of the Indian Constitution³⁴ (along with its restrictions as envisaged in Art. 19 (2) of the Constitution³⁵) is probably the predominant torchbearer in the path of the right to information, both as a right and as a tool for strengthening democracy.

The Right to Information is a basic human right derived from Article 19(1) (a)³⁶ of the Constitution of India. It states, “All the citizens have the right to the freedom of speech and expression and Art. 21 deals with the right to life of citizens. The Constitution of India, 1950 stated that the Court has recognized the right to access of information from government departments, is fundamental to democracy. However, Right to Information does not mean the free flow of information without any restrictions. Right to Information also has certain reasonable restrictions like other fundamental rights. The Right to Know, which is derived from the concept of freedom of speech,

³² The Official Secrets Act, 1923, NO.19, 1923 (India).

³³ The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

³⁴ INDIA CONST. art. 19, cl. 1 (a).

³⁵ INDIA CONST. art. 19, cl. 2.

³⁶ INDIA CONST. art. 19, cl. 1 (a).

though not absolute, is a factor, which should make one wary, when secrecy is claimed for transactions, which can, at any rate, have no repercussions on public security.

Even without taking recourse to the penumbra approach, the freedom of free speech and expression³⁷ on one hand and the Right to Information Act, 2005³⁸ on the other, can be considered as complementary and supplementary to each other, by taking recourse to the Lord Coke's Rule.³⁹ Hence while interpreting the Right to Information Act, 2005⁴⁰ within the framework of the Indian Constitution, the underlying purpose of the Act must not be kept outside the board.⁴¹

In this regard, the verdict of our apex court in the case of Subhash Popatlal Dave v. Union of India⁴² shall be kept in mind, where the apex court categorically sounds a caution against any attempt to override the constitutional provisions by using the Right to Information Act, 2005.⁴³

³⁷ INDIA CONST. art. 19, cl. 1 (a).

³⁸ The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

³⁹ G. A. ENDLICH, A COMMENTARY ON THE INTERPRETATION OF STATUTES 35 (Indian Economy Reprint, Law and Justice Publishing Co. 2025). Though this commentary is based upon the celebrated treatise of Sir Peter Benson Maxwell, on the interpretation of statutes, and both the former book and the latter book are based upon the English legal system, but the inherent legal principles are equally applicable in the Indian scenario.

⁴⁰ The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

⁴¹ See also *Smith v. Helmer*, 7 Barb. (N.Y.) 416, *Barker v. Esty*, 19 Vt. 131, *Blackwood v. Reg.*, L.R. 8 App. Cas. 94, *O'Neal v. Robinson* Id. 526, *McCulloch v. State*, 11 Ind. 424.

⁴² AIR 2012 SC 3370.

⁴³ The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

The Supreme Court, in a plethora of judgments,⁴⁴ made it abundantly clear that the element of knowledge is infused within the freedom of free speech and expression, as mentioned under Art. 19 (1) (a)⁴⁵ of the Indian Constitution.

It can be submitted that this right to knowledge is substantially connected with the freedom of discussion, as according to Lord Simon, the freedom of discussion is an innate element within the freedom of free speech.⁴⁶

IV) CONCLUSION

The concluding argument of this research paper shall take into cognizance, the Double Proportionality Test, as envisaged in the *Campbell v. MGM Limited*⁴⁷ and adopted by the Honourable Chief Justice of India, Dr. Dhananjaya Y Chandrachud (as he then was) in the case of *Central Public Information Officer, Supreme Court of India v. Subash Chandra Agarwal*⁴⁸ and also noted with approval in the case of *Association for Democratic Reforms v. Union of India*,⁴⁹ to maintain and strike a balance, between the right to get information and the right to privacy within the Indian legal plateau, which is a cardinal issue in the Indian legal domain, more so, because of

⁴⁴ See *State of Uttar Pradesh v. Raj Narain*, (1975) 4 SCC 428; *People's Union for Civil Liberties v. Union of India*, (2003) 2 SCR 1136; *District Registrar and Collector v. Canara Bank*, AIR 2004 SC 1442; *A.S. Rawat v. Dawa Tashi*, 2023 SCC OnLine Del 1504; *Sabu Mathew George v. Union of India* (2018) 3 SCC 229.

⁴⁵ INDIA CONST. art. 19, cl. 1 (a).

⁴⁶ *A.-G. v. Times Newspaper*, (1974) A.C. 273; this verdict of Lord Simon is quoted with approval by H.M. Seervai, in his celebrated commentary on Indian Constitution. See 1 H.M. SEERVAI, CONSTITUTIONAL LAW OF INDIA-A CRITICAL COMMENTARY 370 (3rd ed. Law and Justice Publishing Co. 2023).

⁴⁷ [2004] UKHL 22.

⁴⁸ [2010] 13 S.C.R. 1120.

⁴⁹ [2024] 2 S.C.R. 420.

the absence of any legislation like the Privacy Act, 1974 of United States of America (USA)⁵⁰ which can declare the predominance of the right to get information over the issue of privacy or vice versa.

The recognition of the right to privacy as a fundamental right within the Indian Constitutional framework may possess a risk to bemuse the issue of the right to get information, but the apex court of India, in a finespun manner, while imbuing the right to privacy within the fold of fundamental right, eschewed this possibility, by not tracing the right to privacy within the periphery of any single provision pertaining to fundamental right. Rather, the Supreme Court in the case of Justice KS Puttaswamy v. Union of India,⁵¹ successfully assimilated the right to privacy within the ambit of Part-III of the Indian Constitution,⁵² without alluding it to any particular provision of the Part-III of the Indian Constitution.⁵³

This headway of the Indian jurisprudential approach from the principle of ‘Doctrinal Predominance’ to the ‘Structured Proportionality Standard’ is being indicated with approval, by the then Honourable Chief Justice of India, Dr. Dhananjaya Y Chandrachud (as he then was) in the Electoral bond case,⁵⁴ and it can be humbly submitted that this approach clearly points out the relevance of the right to information, especially in the context of the right to privacy, and this approach opens a new avenue for a more holistic approach towards the protection of the constitutional mandates, of which, right to information is an integral part.

⁵⁰ *Supra* note 16.

⁵¹ [2017] 10 S.C.R 569.

⁵² INDIA CONST. part-III.

⁵³ INDIA CONST. part-III.

⁵⁴ Association for Democratic Reforms v. Union of India, [2024] 2 S.C.R. 420.

On the other side of the board, the conjoint reading of the *Union of India v. Association for Democratic Reforms*⁵⁵ and the *PUCL v. Union of India*,⁵⁶ clearly substantiate the element of knowledge and opinion, based upon information.

At the same time, in the *HDFC Bank Ltd. v. Union of India*,⁵⁷ while *prima facie* placing the judgment of the same court in *Reserve Bank of India v. Jayantilal N. Mistry*⁵⁸ in contrast, the apex court clearly adopted a balancing approach, while dealing with the right to information.

After the closer scrutiny of this entire spectrum, it can be submitted that, it *prima facie* allude to a disinclination of the Indian legal discourse in general and the judiciary in particular, towards the concept of fiduciary capacity within the realm of right to information, if not directly, and it suggests the intrusion of both the ‘Structured Proportionality Standard’⁵⁹ and the ‘Double Proportionality Standard’⁶⁰ in the interaction between the right to information and the fundamental rights of the land, and this clearly suggests a more knowledge-centric approach of the Indian legal system in the arena of the right to information.

It can be humbly submitted that data and information possess a value only in the course of knowledge formation, which will lead untimely to the formation of opinions. The prime purpose of information is to provide the relevant data required for knowledge and hence it is the knowledge and opinion which is the penultimate product of information.

⁵⁵ [2002] 3 S.C.R. 696.

⁵⁶ [2003] 2 S.C.R. 1136.

⁵⁷ [2022] 13 S.C.R. 502.

⁵⁸ (2016) 3 SCC 525.

⁵⁹ *Association for Democratic Reforms v. Union of India*, [2024] 2 S.C.R. 420.

⁶⁰ *Association for Democratic Reforms v. Union of India*, [2024] 2 S.C.R. 420.

The aforementioned knowledge-centric approach is more prominent in India in comparison to its counterparts in the USA and UK, notwithstanding the absence of any dedicated privacy protection legislation, due to the approach of the Indian judiciary, and the data-centric approach of the Right to Information Act, 2005,⁶¹ however minimum, is being incinerated and converted to a more knowledge-centric approach.

Dissection of the concept of knowledge in the domain of epistemology, leads to three possible categories of knowledge, viz. acquaintance knowledge, knowledge-that and knowledge-how.⁶²

The perception element of knowledge can be deciphered from this epistemological approach and this deduces the element of perception formation within the discourse of knowledge, by using data/information as a tool. Hence the element of perception formation in the shape of knowledge,⁶³ must be preserved in the discourse as to the right to information, failing which, the prime purpose of information, at least in the legal domain, will sizably allay with time.

Now the attempt to assimilate the element of efficiency, as propounded by Rawls,⁶⁴ within the discourse of the right to information and the concomitant idea of knowledge, clearly insinuates the requirement of knowledge formation, within the statutory framework regarding right to information. Thus only a data-centric approach will defeat the basic jurisprudential purpose of the Right to Information Act, 2005.⁶⁵

⁶¹ The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

⁶² STANFORD ENCYCLOPEDIA OF PHILOSOPHY, <https://plato.stanford.edu/entries/knowledge-how/> (last visited on June 9, 2025).

⁶³ Smita Srivastava, *The Right to Information in India: Implementation and Impact*, Volume 1, No. 1 Quarter IV AFRO ASIAN JOURNAL OF SOCIAL SCIENCES 1, 12 (2010).

⁶⁴ RWM Dias, *Jurisprudence* 481 (5th ed, LexisNexis, 2017).

⁶⁵ The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

Before parting with the matter, it must be remembered that, in order to use information as a predominant tool for perception formation, which is directly connected with that of knowledge and data, the issue regarding the efficiency of social institutions must be infused in a pestilence manner within the discourse as to information, to secure a mettlesome impact from that of the Right to Information Act, 2005⁶⁶ at least in the Indian legal context, because ‘sunlight is the best medicine’.⁶⁷

⁶⁶ The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

⁶⁷ Dinesh Trivedi v. Union of India, [1997] 3 S.C.R. 93.