

“Comparative Study of Right to Information Acts (RTI): United States, United Kingdom, and India”

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ABSTRACT

The Comparative Study of Right to Information Acts (RTI) analyzes the legislative frameworks and implementation of RTI laws in the United States, the United Kingdom, and India. It aims to understand the similarities, differences, and key features of these acts, focusing on their effectiveness in promoting transparency, accountability, and citizen empowerment. The study examines legal provisions, institutional structures, information scope, access procedures, exemptions, appeals mechanisms, and the role of oversight bodies in each country. By studying these frameworks, the research identifies best practices, challenges, and areas for improvement in RTI act implementation. Through case studies and empirical data, the study evaluates the impact of these acts on good governance, corruption reduction, public participation, and government responsiveness. It assesses the extent to which RTI laws empower citizens, facilitate informed decision-making, and foster transparency and accountability in government processes. Additionally, the study explores the roles of civil society organizations, the media, and other stakeholders in utilizing RTI provisions. It analyzes usage patterns, information request trends, and the effectiveness of complaint and appeal mechanisms. The findings of this study contribute to the global discourse on the right to information, providing policymakers, researchers, and practitioners with insights and recommendations to enhance access to information regimes. Lessons learned from the United States, the United Kingdom, and India offer valuable guidance for strengthening the effectiveness and impact of RTI laws worldwide.

Keywords: Right to Information Acts, Comparative Study, United States, United Kingdom, India, Transparency, Accountability

Introduction:

The Right to Information (RTI) is a globally recognized principle that originated from a manifesto passed by the United Nations General Assembly in 1948 (Gomez, 2019). Article 19(2) of this declaration enshrines the freedom of expression, which includes the right to receive and impart information (O’Flaherty, 2012). This recognition solidified the notion that access to information is a fundamental right, essential for fostering transparent and accountable governance (Oni et al., 2022). Over the years, the right to information has gained significant traction worldwide, with 85 nations currently recognizing and implementing it. The early pioneers in granting this right to their citizens were Sweden in 1766, followed by Finland in 1951, and Norway and Denmark in 1970 (Tews et al., 2003). These countries

paved the way for others to follow suit, realizing the importance of providing their citizens with the means to access information held by public authorities.

In the United States, the right to information was established with the passage of the Freedom of Information Act (FOIA) in 1966 (Relly et al, 2016). The FOIA grants individuals the right to request records held by federal agencies, promoting transparency and ensuring accountability (Yannoukakou, et al, 2014). The FOIA has been instrumental in empowering citizens to scrutinize government actions and hold public officials accountable (McDermott et al, 2010). Similarly, other countries recognized the importance of the right to information and enacted their own RTI laws. Australia, the Netherlands, and France implemented their respective legislation during the 1970s, recognizing the citizens' right to access government-held information. New Zealand, Canada, and Australia followed suit in 1982, further solidifying the importance of transparency and accountability in democratic societies. In the 1990s, several countries around the world recognized the need for comprehensive RTI legislation. Hungary and the United Kingdom enacted their laws in 1992, ensuring that citizens had access to information held by public authorities (Berliner 2014). Russia and Hong Kong recognized the right to information in 1995, followed by Thailand and Ireland in 1997. The year 1998 witnessed the introduction of the right to information laws in Israel, Georgia, and South Korea, marking a significant global trend towards transparency and accountability. Japan, Albania, and Trinidad and Tobago followed suit in 1999, with Bulgaria implementing its RTI law in the year 2000.

This review focuses on the RTI frameworks of the United States, the United Kingdom, and India, three nations with distinct legal provisions and implementation mechanisms. By analyzing these frameworks, we aim to gain insights into the similarities, differences, and best practices adopted by these countries in ensuring their citizens' right to access information. The analysis will delve into the key provisions of the RTI acts in each country, including the scope of information covered, the procedures for requesting information, any exemptions or limitations, and the mechanisms for appeal and oversight. By examining the implementation mechanisms, such as the role of designated information officers and the process for handling information requests, we can assess the effectiveness and efficiency of each country's RTI framework. Furthermore, the study will evaluate the overall impact of the RTI acts in promoting transparency, accountability, and citizen empowerment. It will examine case studies and empirical data to assess the extent to which the right to information laws have empowered citizens, facilitated informed decision-making, reduced corruption, and improved public service delivery. Additionally, the review will explore the role of civil society organizations, the media, and other stakeholders in promoting and utilizing the provisions of the RTI acts. It will analyze the patterns of usage, trends in information requests, and the effectiveness of mechanisms for handling complaints and appeals. This will provide insights into the engagement and involvement of various actors in ensuring the effective implementation of the right to information.

RTI in United States

The Freedom of Information Act (FOIA) was enacted in the United States in 1966 and went into effect in 1967 (Cordis, et,al 2014). It has undergone several amendments, with the most recent amendment made in 1996 through the Electronic Freedom of Information Act. This law allows individuals and organizations to request access to records held by various federal agencies. The scope of FOIA covers executive and military departments, government corporations, and other entities that perform government functions, excluding Congress, the Federal Courts, and the immediate staff of the President at the White House, including the National Security Council. Government agencies are required to respond to FOIA requests within 20 working days. FOIA includes nine categories of discretionary exemptions that allow agencies to withhold certain information. These exemptions include business information, personal privacy, inter and intra-agency memos, national security information protected by other statutes, law enforcement records, oil-well data, financial institutions, and internal agency rules (Lebovic, 2018).

In 2003, the Homeland Security Act introduced a provision that prohibits the disclosure of voluntarily provided business information related to "Critical Infrastructure." (Feinberg, 2004). Denials or complaints about extensive delays can be appealed internally within the concerned agencies, and decisions made by any agency can be reviewed and overturned by the Federal Courts. The U.S. Department of Justice provides training and guidance to agencies regarding FOIA.FOIA also mandates that government agencies publish materials related to their rules, structure, functions, decisions, policies, procedures, and manuals. The 1996 E-FOIA amendments made it compulsory for agencies to establish "electronic reading rooms" and make requested information available electronically (Oltmann, et al 2006). The Department of Justice has issued guidance that specifies the documents that must be made available electronically.

The most commonly cited exemptions for withholding information under FOIA are related to law enforcement and personal privacy. However, the effectiveness of FOIA has been undermined by a lack of central oversight and significant processing delays in many agencies (Kwoka, et al 2022). In some cases, requested information has been released only after years or even decades. In 2002, the General Accounting Office found substantial and increasing backlogs in processing FOIA requests across the government, indicating that agencies were falling behind. A 2003 audit by the National Security Archive identified various problems with agency practices, including inadequate or incomplete information about agency FOIA policies, failure to acknowledge requests, lost requests, excessive backlogs, decentralized operations leading to delays and lack of oversight, inconsistent practices regarding the acceptance of administrative appeals, and the potential for appealing FOIA determinations to further delay processing but also gain the agency's attention.

To conclude, the FOIA remained in effect as it has since its last amendment in 1996 through the Electronic FOIA (Stewart, et al 2016). The provisions of FOIA, including the right to

request records from federal agencies and the exemptions for withholding certain information, have not undergone any substantial changes. However, ongoing discussions and debates regarding FOIA reform continue, with proposals aimed at improving transparency, reducing delays, and enhancing public access to information. As of now, no significant legislative changes have been made to FOIA.

RTI in United Kingdom

In the United Kingdom, the Freedom of Information Act (FOIA) was adopted in November 2000, following almost 20 years of campaigning. This Act grants every citizen a general right of access to information held by public authorities (Shepherd 2015). Public authorities are required to respond to information requests within 20 working days.

The FOIA categorizes exemptions into three main categories:

- **Absolute Exemption:** Under this category, certain types of information cannot be disclosed. This includes personal information, court records, information relating to or from the security services, information obtained under confidence, and information protected by other laws.
- **Qualified Class Exemption:** Information falling within a broad class of exempted information is not disclosed under this category. Examples include information related to the formulation of government policies, safeguarding national security, investigations, royal communications, legal privileges, public safety, or information received from foreign countries.
- **Limited Class Exemption:** Government bodies must demonstrate specific prejudice or harm to withhold information under this category. It covers information related to defense, economy, international relations, commercial interests, crime prevention, and any information that would prejudice the conduct of public affairs or inhibit the unbiased provision of advice.

The concept of public interest applies to the last two categories. If the public interest in maintaining the exemption outweighs the public interest in disclosure, the information can be withheld.

The Information Commissioner oversees and enforces the Act. This commissioner has the authority to receive complaints and issue decisions. However, if the commissioner orders the release of information based on the public interest test, the minister of the department with the ministerial certificate can overrule the decision. Appeals against the commissioner's decisions can be made to the Information Tribunal, which can also review and overturn certificates on limited grounds (Lee 2005). Before the FOIA came into effect, a non-statutory "Code of Practice on Access to Government Information" provided some access to government records (Lee 2005). However, it had 15 broad exemptions. Applicants whose requests were denied could complain to the Parliamentary Ombudsman through a Member of Parliament.

In June 1998, the United Kingdom signed the Aarhus Treaty, which led to the implementation of the Environmental Information Regulations (EIR) in 1992. The EIR implemented the 1990 European Union Directive on access to environmental information (Whittaker 2017). The EIR is considered stronger than the FOIA, with a more stringent prejudice test to restrict information and limited power for ministers to veto the commissioner's decisions. The EIR came into effect in January 2005. The Welsh Assembly adopted a Code of Practice that deviated from the Code of the United Kingdom. According to this Welsh Code, information can be disclosed unless it would cause substantial harm upon release. The Welsh Assembly enjoyed limited legislative power. Additionally, the Local Government (Access to Information) Act 1985 provides the right of access to background papers regarding the policies and practices of local authorities. It also extends to various meetings of local authorities and some other public authorities that are open to the public (Bulmer, et al 2006).

RTI in India

Right to Information (RTI) Act, 2005

Participation, transparency, legitimacy, and responsiveness are the pillars of good governance. In India, the RTI Act, 2005 was passed to implement the concept of good governance. Derived from the Fundamental Right of 'Freedom of Speech and Expression' under Article 19 of the Indian Constitution, the Right to Information (RTI) empowers citizens and enables their participation in public life, governance, and society. Enacted on October 12, 2005, the RTI Act marked a significant shift in Indian democracy, ushering in a new era of empowerment for the common man. It is considered a path-breaking legislation that transitions from secrecy to transparency, strengthening participatory democracy and promoting people-centered governance.

The Right to Information Act opens up government records to public inspection, making the government more accountable and providing citizens with a vital tool to understand the government's actions and effectiveness. Transparency in government organizations enhances their functioning in an objective manner, promoting predictability. Moreover, access to information about the government's operations allows citizens to effectively participate in the governance process. RTI Act appoints Public Information Officers (PIOs) in every office and department to receive and provide relevant information to applicants. These officers are responsible for transferring and forwarding letters to the concerned persons or authorities within 5 working days. Additionally, Assistant Public Information Officers (APIOs) are designated in public offices to receive RTI requests, further facilitating the flow of information.

Objectives of RTI:

- Empowering citizens
- Making government systems more transparent and accountable

- Preventing and eliminating corruption
- Enhancing democracy
- Ensuring better vigilance on the instruments of governance

Salient features of RTI Act, 2005:

- The term 'information' includes various forms such as records, documents, emails, circulars, press releases, etc.
- Any citizen of India can request information from a 'public authority' which must reply expeditiously or within 30 days (Mishra 2009).
- Citizens have the right to request and obtain information in various formats, inspect documents, and take certified samples.
- The Act relaxes the Official Secrets Act and other laws restricting information disclosure, overriding them if there is inconsistency.
- Public authorities are required to computerize records, proactively publish information, and disseminate it widely.
- The Act mandates the publication of 16 categories of information, including organization particulars, functions, and decision-making processes.
- Some information is exempt from disclosure, but public interest can override these exemptions, and after 20 years, exempted information is no longer protected.
- Penalties are imposed for refusal to receive an application or provide information, with a maximum penalty of Rs. 25,000 (Sharma 2009).
- Appellate authorities, including the Central Information Commission (CIC)/State Information Commission, can be approached if an applicant is not satisfied with the information or response received.

These features and provisions of the RTI Act aim to promote transparency, accountability, and citizens' right to information, reinforcing the principles of good governance in India..

Information Exclusion from RTI Act

Under Section 8 of the Right to Information (RTI) Act, certain types of information are exempted from disclosure. These exemptions include information that could potentially affect the sovereignty and integrity of India, as well as information that pertains to national security. Additionally, any information that is prohibited from being published by a court or tribunal is also exempted. Furthermore, the RTI Act exempts information that is related to the secrecy of trade and commerce, including intellectual property, and information that involves confidence from foreign governments. Moreover, specific information related to central intelligence and security agencies, as specified in the 2nd Schedule of the Act, is also exempted. The agencies mentioned in the 2nd Schedule that fall under these exemptions include the Intelligence Bureau (IB), Research and Analysis Wing (RAW), Central Bureau of Investigation (CBI), Income Tax, Directorate of Revenue Intelligence, Directorate of Enforcement, Narcotics Control Bureau, Avionics Research Centre, Border Security Force

(BSF), Central Reserve Police Force (CRPF), among others.

Achievement of RTI Act

The Right to Information (RTI) Act has had significant achievements in the United States, the United Kingdom, and India. Here are some notable achievements in each country:

- The FOIA, enacted in 1966, established the right of access to federal agency records. It has played a crucial role in promoting transparency and accountability in the U.S. government.
- The FOIA has enabled citizens to request and obtain information from various government agencies, allowing for greater public awareness and scrutiny of government actions and policies.
- The availability of information through the FOIA has empowered journalists to conduct in-depth investigations and uncover important stories that hold public officials accountable.
- The FOIA has facilitated public participation in government decision-making processes by providing access to information necessary for informed public engagement.
- The UK's FOIA has brought about a cultural shift in the government's approach to openness and transparency.
- The act has allowed citizens to access a wide range of information held by public authorities, fostering greater accountability and trust in government.
- The FOIA has facilitated investigative journalism and encouraged public scrutiny of government decisions, policies, and expenditures.
- The act has led to the disclosure of previously secret information, including historical records, which has contributed to a better understanding of past events.
- The RTI Act in India, enacted in 2005, has empowered citizens by providing them with a legal framework to access government information (Jain 2013).
- The act has played a crucial role in promoting transparency and accountability in government functioning at all levels.
- The RTI Act has been instrumental in exposing corruption and misuse of power, leading to disciplinary action against public officials involved in malpractices.
- The act has had a significant impact at the grassroots level, allowing marginalized communities and individuals to assert their rights, access entitlements, and demand accountability from local authorities.

It is important to note that while the RTI Acts in these three countries have achieved notable successes, challenges and limitations still exist in the effective implementation and utilization of the legislation.

Critical Evaluation of RTI

The Right to Information (RTI) acts in the USA, UK, and India are significant legislation that aims to promote transparency and empower citizens to access information held by public authorities. Here is a critical evaluation of the RTI in these countries:

- ✓ The USA does not have a federal-level RTI law, but there is a patchwork of state-level laws that provide varying degrees of access to information. Some states have comprehensive RTI laws, while others have limited or no legislation in place. This lack of consistency makes it challenging for citizens to exercise their right to information uniformly across the country.
- ✓ Moreover, the implementation and enforcement of RTI laws in the USA face several challenges. There is a lack of centralized oversight, which leads to inconsistent practices and delays in responding to information requests. Some public authorities are resistant to providing certain information, citing exemptions such as national security or privacy concerns. The legal framework also allows for broad discretionary powers for public officials to withhold information.

The UK has a well-established Freedom of Information Act (FOIA) that grants citizens the right to access information held by public authorities (Turle 2007). The FOIA has been instrumental in promoting transparency and accountability. However, there are some areas of criticism.

- ✓ One criticism is the frequent use of exemptions by public authorities to withhold information. The FOIA includes a wide range of exemptions, such as national security, commercial interests, and personal data, which can be invoked to deny access to information. This can lead to a lack of transparency in certain areas of public administration.
- ✓ Another concern is the issue of "refusal notices," where public authorities deny information requests based on cost or administrative burden. This can create barriers for individuals or organizations seeking information, especially if they lack the necessary resources to challenge the decision.

India's Right to Information Act (RTI Act) has been recognized as a progressive legislation that has brought about a significant shift towards transparency and accountability in the country. The RTI Act empowers citizens to access information from public authorities, making the government more answerable to the people. However, there are also some challenges in its implementation.

- ✓ One challenge is the issue of a backlog of pending cases and delays in responding to information requests. The Information Commissions, responsible for adjudicating RTI appeals, face a high volume of cases, leading to substantial delays in the resolution of disputes. This can discourage individuals from pursuing information and hinder the effectiveness of the RTI Act.

- ✓ Another concern is the existence of certain exemptions and loopholes within the Act. Some public authorities misuse exemptions to withhold information, especially when it pertains to matters of corruption or maladministration. The Act also does not cover certain important institutions like political parties, which limits its scope and effectiveness.

The RTI acts in the USA, UK, and India have played a crucial role in enhancing transparency and empowering citizens, there are areas that require improvement. These include ensuring consistent implementation, reducing delays, addressing excessive use of exemptions, and expanding the scope of coverage to promote greater accountability and openness in governance.

Limitations of RTI Acts:

RTI Acts in the USA, UK, and India face various challenges in their implementation.

USA:

- The absence of a federal-level RTI law in the USA leads to a lack of consistency across different states. The scope and effectiveness of RTI vary significantly, making it difficult for citizens to exercise their right to information uniformly.
- The decentralized nature of RTI implementation in the USA results in inconsistent practices and delays in responding to information requests. There is no centralized oversight body to ensure adherence to RTI laws and address issues of non-compliance.
- Public authorities often invoke exemptions, such as national security or privacy concerns, to withhold information. The broad discretionary powers given to public officials can sometimes result in the arbitrary denial of information.

UK:

- The Freedom of Information Act (FOIA) in the UK provides numerous exemptions that allow public authorities to withhold information. This has led to concerns about the overuse of exemptions, potentially limiting transparency in certain areas of public administration.
- Public authorities in the UK can refuse information requests based on cost or administrative burden. This can create barriers for individuals or organizations seeking information, especially if they lack the necessary resources to challenge the decision.
- The process of responding to information requests in the UK can sometimes be time-consuming, resulting in delays. This can hinder the timely access to information and frustrate individuals seeking information.

India:

- The Information Commissions in India, responsible for adjudicating RTI appeals, often face a backlog of pending cases. This leads to significant delays in the resolution of disputes and discourages individuals from pursuing information.
- Some public authorities misuse exemptions under the RTI Act in India to deny or withhold information, particularly in cases involving corruption or maladministration. This undermines the objective of transparency and accountability.
- The RTI Act in India does not cover certain important institutions like political parties, limiting its scope. This creates gaps in the accessibility of information, hindering efforts to promote transparency and accountability across all sectors.

These challenges highlight the need for continuous monitoring and improvement of RTI legislation in these countries. Efforts should be made to address issues of non-compliance, reduce delays, minimize the arbitrary use of exemptions, and expand the coverage of the Acts to ensure greater transparency and accountability in governance.

Future Prospective

The future prospects of the Right to Information (RTI) Acts in the USA, UK, and India hold the potential for further strengthening transparency and accountability. Here are some potential future developments:

USA:

- There have been ongoing discussions about the need for a federal-level RTI law in the USA to provide consistent and comprehensive access to information across all states. The establishment of a unified legal framework could enhance transparency and streamline the implementation of RTI.
- Efforts could be made to establish a centralized oversight body or strengthen existing mechanisms to ensure proper enforcement of RTI laws. This could help address inconsistencies and delays in responding to information requests.
- A review of the broad exemptions under state-level RTI laws could be undertaken to ensure they are balanced and not overly restrictive. This would help prevent excessive use of exemptions and promote greater access to information.

UK:

- The UK could undertake a review of the exemptions under the Freedom of Information Act (FOIA) to strike a better balance between transparency and the protection of legitimate interests. This could help reduce overuse of exemptions and enhance public access to information.

- Efforts could be made to streamline the FOIA process and address delays in responding to information requests. This may involve enhancing the efficiency of information retrieval and reducing bureaucratic hurdles.
- Promoting public awareness and engagement around the FOIA could encourage citizens to exercise their right to information. This could involve educational campaigns, training programs, and the use of technology to facilitate information requests and dissemination.

India:

- Measures could be taken to address the backlog of pending cases and reduce delays in the resolution of RTI appeals. This might involve allocating more resources to Information Commissions and streamlining their processes.
- Efforts could be made to strengthen the institutional framework supporting the implementation of the RTI Act in India. This could include capacity building for public officials, ensuring adequate infrastructure, and promoting transparency and accountability within Information Commissions.
- The scope of the RTI Act could be expanded to include institutions currently not covered, such as political parties and private bodies that perform public functions. This would help address gaps in transparency and accountability and enhance public access to information.

The RTI Acts in the USA, UK, and India depend on continued efforts to address existing challenges, promote public awareness, strengthen enforcement mechanisms, and adapt to evolving technological advancements. By doing so, these countries can further enhance transparency, accountability, and citizen participation in governance.

Conclusions

In conclusion, the RTI Acts in the United States, United Kingdom, and India have significantly contributed to the promotion of transparency and accountability in their respective countries. While each country has its own unique challenges and areas for improvement, a comparative study reveals both similarities and differences in their implementation and impact. The United States lacks a federal-level RTI law, resulting in a patchwork of state-level legislation. This decentralization poses challenges in achieving uniformity and consistency in citizens' right to access information. However, there is potential for future developments, such as the establishment of federal legislation and the strengthening of enforcement mechanisms, which could enhance transparency and streamline the RTI process. The United Kingdom's FOIA has been instrumental in fostering transparency. However, concerns arise regarding the overuse of exemptions and the potential for excessive administrative burden. To improve the FOIA's effectiveness, a review of exemptions and streamlining of processes are necessary, alongside efforts to increase public awareness and engagement. India's RTI Act has been widely recognized for its progressive

approach to transparency and accountability. Despite its successes, challenges remain, including the backlog of cases, misuse of exemptions, and limited coverage. Future prospects involve addressing these issues through reduced delays, strengthened institutions, and expanding the Act's coverage to encompass currently exempt institutions. Across these countries, certain common themes emerge. Overreliance on exemptions is a challenge, potentially undermining the objective of transparency. Delays in processing information requests are prevalent, hindering timely access. Centralized oversight and enforcement mechanisms are necessary to ensure compliance and address inconsistencies. Looking ahead, the future of RTI Acts in these countries relies on continuous improvements. This includes federal-level legislation in the United States, reviewing exemptions and streamlining processes in the United Kingdom, and addressing challenges like backlog and limited coverage in India. Public awareness and engagement, alongside technological advancements, play crucial roles in enhancing the implementation and impact of the RTI Acts. In summary, while the RTI Acts in the United States, United Kingdom, and India face challenges, they have played significant roles in promoting transparency and accountability. By addressing these challenges and embracing future prospects, these countries can further empower citizens, strengthen governance, and foster a culture of openness and accountability.

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