

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

Appeal No. 6796 of 2026

Unnikrishnan M S : Appellant
Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated March 08, 2026 (received by SEBI through RTI MIS portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated March 13, 2026 responded to the application filed by the appellant. The appellant filed an appeal (Reg. No. SEBIH/A/E/26/00102) dated March 13, 2026. I have carefully considered the application, the response and the appeal and find that the matter can be decided based on the material available on record.

2. **Queries in the application** - The appellant, in his application dated March 08, 2026, sought the following information:

“1. What is the present sanctioned strength and present working strength of Grade A Officers as on the date of this application?

2. How many Grade A vacancies are officially unfilled(i.e., vacancy position) as on the date of this application?

3. Has the SEBI initiated or approved any requisition/ proposal for recruitment to Grade A Posts for the cycle after the ongoing 2025 recruitment?”

3. **Reply of the Respondent** – With regard to query nos. 1 and 2, the respondent has informed that sanctioned strength is determined from time to time as per man power requirements and work exigencies. Current sanctioned strength of SEBI Officers- Grade A to F and Persons in Position as on January 31, 2026 is 1166 and 1030 respectively. Sanctioned strength includes ongoing recruitment exercise of 135 officers in Grade A.

With regard to query no. 3, the respondent informed that the query is in the nature of seeking clarification/opinion. Accordingly, the same cannot be construed as “information”, as defined u/s 2(f) of the RTI Act. Further, respondent informed that vacancies arise due to promotions, resignations and retirements of employees. SEBI undertakes recruitment and promotion exercises periodically to fill up the vacancies. The respondent also mentioned that the details regarding the recruitment exercise are published on SEBI website.

4. **Ground of appeal** – The appellant has filed the appeal on the ground that he was provided incomplete, misleading or false information.
5. I have perused the application and the response provided thereto. With regard to query nos. 1 and 2, I note that the respondent has adequately addressed the queries by providing the information available with him. Notwithstanding the aforesaid, the appellant may note that the directory of SEBI employees are available on SEBI website. The path and the link to access the same are given hereunder:

<https://www.sebi.gov.in/sebiweb/home/directory-of-sebi.jsp>

Path: About>> SEBI Directory

6. With regard to query no.3, I concur with the response of the respondent the query is in the nature of seeking clarification from the respondent. I find that the said query cannot be construed as seeking ‘information’ as defined under section 2(f) of the RTI Act. Consequently, the respondent did not have an obligation to provide such clarification or opinion under the RTI Act. In this context, reliance is placed on matter of *Azad Singh vs. CPIO, Oriental Insurance Company Limited* (order dated March 23, 2021) wherein Hon’ble Central Information Commission observed that “7. *The Commission, after hearing the submissions of both the parties and after perusal of records, observed that some queries of the appellant are in the nature of seeking explanation/ opinion/ advice/ confirmation/ clarification from the CPIO and he has expected that the CPIO firstly should analyze the documents and then provide information to the appellant. But the CPIO is not supposed to create information; or to interpret information; or to compile information as per the desire of the appellant under the ambit of the RTI Act. As per Section 2(f) of the RTI Act, the reasons/ opinions/ advices can only be provided to the applicants if it is available on record of the public authority. The CPIO cannot create information in the manner as sought by the appellant. The CPIO is only a communicator of information based on the records held in the office and hence, he cannot be expected to do research work to deduce anything from the material therein and then supply it to him.*” Accordingly, I do not find any deficiency in the response of the respondent.

7. In view of the above observations, I find that there is no need to interfere with the decision of the respondent. The appeal is accordingly dismissed.

Place: Mumbai

Date: April 01, 2026

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