

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

Appeal No. 6571 of 2025

Pranav Hemantbhai Variava : Appellant
Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated August 20, 2025 (received by the respondent through RTI MIS Portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated September 18, 2025, responded to the application filed by the appellant. The appellant filed an appeal (Reg. No. SEBIH/A/E/25/00255) dated September 22, 2025. I have carefully considered the application, the response and the appeal and find that the matter can be decided based on the material available on record.
2. The appellant has filed appeal only against the response of the respondent to query nos. 1-5 in the application.
3. **Query nos. 1-5 in the application** - The appellant, vide query nos. 1-5 in his application, sought the following information:

“I am Pranav Hemantbhai Variava, formerly employed with Securities and Exchange Board of India (SEBI) with employee ID 1987, and am exercising my right under Section 6(1) of the RTI Act, 2005, to seek information pertaining to the processing of my request for deputation/ lien while I was serving in your organization.

I had requested for deputation/ lien vide application dated 28 September 2022 (Deputation Request). I understand that the said Deputation Request was not acceded to, and I seek the relevant records and documents regarding the same. I kindly request you to provide the following information under the RTI Act, 2005:

- 1. Certified copies of the criteria, rules, guidelines, office memoranda, circulars, or any other instructions that were considered/ relied upon while examining/ deciding my Deputation Request.*

2. Certified copies of all office notings, file notings, minutes of meetings, internal notes, inter-departmental correspondences, approvals, and communications (both physical and electronic) made in connection with the processing of my Deputation Request.

3. Certified copies of any letters, representations, or correspondence (including electronic mails or memos) exchanged between different officers/ sections/ departments of the organization, between the organization and any other government department/ organization, or between the organization and myself, relating to my Deputation Request.

4. Certified copies of any precedents or prior case records relied upon while considering my Deputation Request.

5. Certified copies of the final noting, order, or communication through which the decision of denial of my Deputation Request was taken, along with the specific reasons/grounds recorded for such denial.”

4. **Reply of the Respondent** –The respondent, in response to query nos. 1-5 in the application, informed that the information sought relates to an issue which is strictly meant for employees of SEBI. The respondent informed that the information sought pertains to the internal functioning of SEBI and is strategic in nature and pertaining to the policy making decision of SEBI. The disclosure of such strategic and confidential internal information is exempt u/s 8(1)(a) of RTI Act.
5. **Ground of appeal** – The appellant has filed the appeal on the ground that he was refused access to the information requested.
6. I have perused the application and the response provided thereto. On consideration, I note that the requested information was denied by the respondent under Section 8(1)(a) of the RTI Act. However, on consideration, I find that the respondent has not provided sufficient justification for the invocation of the aforesaid Section. Therefore, I find that the application has not been adequately addressed by the respondent and the same warrants reconsideration.
7. Considering the above observations, I remit the application to the respondent for *de novo* consideration of the application and sending appropriate response to the appellant in terms of RTI Act, within 15 working days from the date of receipt of this order.

8. The appeal is accordingly disposed of.

Place: Mumbai

Date: October 14, 2025

RUCHI CHOJER

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