

**OFFICE OF THE FIRST APPELLATE AUTHORITY**  
**(Appointed under the Right to Information Act, 2005)**  
**The Institute of Company Secretaries of India ICSI House**  
**C-36, Sector-62, Institutional Area**  
**Noida - 201 309 (U.P.)**

**Appeal No.00069/2025**

IN THE MATTER OF:

Mr. Naveen Bhatnagar  
E-21/D, Vatika Apartments,  
Maya Puri  
Delhi – 110064

Appellant

Vs.

Central Public Information Officer  
The Institute of Company Secretaries of India  
'ICSI House', 22, Institutional Area, Lodi Road,  
New Delhi – 110003

Respondent

Date of Order: 25<sup>th</sup> October 2025

**ORDER**

- (1) The Appellant has filed first Appeal- No. ICSOI/A/E/25/00069 on 28.09.2025 under Section 19(1) of the Right to Information Act, 2005 in connection with Response vide letter dated 17.09.2025 against the Central Public Information Officer (hereinafter referred to as Respondent) of the Institute of Company Secretaries of India.
- (2) The Appellant vide his RTI Application No. ICSOI/R/E/25/02344 dated 24/08/2025 has requested the following information:

“ICSI Continuous Professional Education Guidelines, 2019, as per attachment, provides guidelines to its Members for Continuous Professional Education. In this regard

1. Those Members of ICSI, who also happen to be an Advocate, is there any scheme of things / relaxation. If so, details thereof may please be provided. Is there any such proposal on anvil.
2. Do Campus Placement, Faculty in Corporate Leadership Development Program for over 4 hours within ICSI Premises, Author for Books on Law, Higher Education, Foundation Day strictly not cover/ come under the ambit. Justification, therefore.
3. Do possessing a number of Academic Qualifications, Higher Education in the field of Law covered for any relaxation, exemption.
4. Do program conducted wherein Politicians, Religious Preaching, Discourses, Cultural Events, Doctors advising serious Heart, Stroke, Cervical Cancer program and given Credit Hours therefore. What is the Justification under ACADEMIC LEARNING FOR CS MEMBERS.

5. Published Article in Chartered Secretary possibly in April 2007. No Credit Hours considered?? Any reason, justification, therefore.
6. Is any online validation such as an play store app to ensure program attendance (both for physical & online programs) under consideration. This will alleviate issues such as subjectivity, software logistics challenges, humane involvement.
7. Is there any proposal mechanism under consideration for granting exemption (under structured learning), relaxation etc. for those Members in Employment, in Practice vis-a-vis their giving Affidavit, Declaration or the like for having performed actual work, rendered services for certain number of Hours.
8. In respect of Question No. (7) hereinabove, is there any proposal under consideration to relax, exempt Fee(s).
9. In last, what is the status of the compliance under the extant Guidelines on date?? What is the number of Members against whom action was initiated under the Company Secretaries Act, 1980, year wise”

- (3) The Appellant has submitted in his instant appeal regarding the reply provided by the Respondent to the RTI queries as under:

“Respected The Institute of Company Secretaries of India Officials,  
At the outset, I am thankful for your having considered my RTI request. I am in receipt of your reply vide Reference Letter No. RTI/2005/6750(25) dated 17.09.2025 online on the RTI portal. I have noted the same. A PIL Writ Petition under Article 32 is being filed before Honorable Supreme Court for the Credit Hours Guidelines Relaxation for the Professionals, in Public Interest, as a Law abiding Citizen. Just as an Fyi, Honorable Supreme Court decision dated 9.8.2011, attachment, more particularly, in para.37 stated that Information and Right to information are intended to be formidable tools in the hands of responsible Citizens to fight Corruption, bring in Transparency, Accountability. This is for your necessary information and with a Humble, Kind request to please reconsider, reaffirm your reply. Should there be any changes to your reply dated 17.09.2025, then the same may be advised accordingly to me at the earliest convenience, pl. Fyi, on similar lines, Sister Professional Institutes too have replied, with some clarity, inputs, etc. on the subject as it pertains to all Professional Community under the aegis of the Ministry of Corporate Affairs, Government of India. To a limited extent urge (to kindly correct me, excuse me, pardon me, if I have written anything factually wrong) Sincerely”

- (4) The reply of the Respondent against the instant appeal is as under: -

“Our reply remains the same as provided in RTI Reply dated 17.09.2025.”

Further, it is to inform that the “the public authority under the RTI Act, 2005 is not to create or collate information; or to interpret information. Therefore, the information which is readily available in the format/content can only be provided to the appellant and not as per the choice of the information seeker. The reply(ies) to the query(ies) cannot be created and designed in the manner and wish of the appellant.

Therefore, the appeal deserves to be dismissed.”

- (5) This Office has carefully considered the application, the response, the appeal and the records made available and finds that the matter can be decided based on the material available on record.

This office concurs with the submissions of the Respondent in his reply to the instant appeal.

The appeal is accordingly disposed of.

Sd/-

(Asit Kumar Rath)  
First Appellate Authority

Copy to:

1. Mr. Naveen Bhatnagar  
E-21/D, Vatika Apartments,  
Maya Puri  
Delhi – 110064
2. Central Public Information Officer  
The Institute of Company Secretaries of India  
'ICSI House', 22, Institutional Area, Lodi Road,  
New Delhi - 110003
3. Directorate of IT - For publishing on the website