

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

Appeal No. 6944 of 2026

Madhu K Lenin : Appellant

Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated May 12, 2026 (received by SEBI through RTI MIS portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated June 09, 2026 responded to the application filed by the appellant. The appellant filed an appeal dated June 23, 2026 (Reg. No. SEBIH/A/E/26/00230). I have perused the application, the response of the respondent 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 May 12, 2026 sought the following information:

“I respectfully seek the following information under the Right to Information Act, 2005 with regard to recruitment, reservation policy and facilities available for Persons with Benchmark Disabilities PwBD in the Securities and Exchange Board of India SEBI.

1. Facilities and considerations for Persons with Disabilities PwBD

a) Whether SEBI has any policy or framework to address difficulties faced by Persons with Disabilities in recruitment and service conditions.

b) Details of facilities, accommodations, assistive measures, accessibility provisions or support mechanisms including monetary facilities provided by SEBI to PwBD employees and candidates.

c) Certified copy of relevant circulars, policies or instructions issued in this regard.

2. HR Manual or Employee Handbook

Kindly provide a PDF copy of the HR Manual, Employee Handbook, Staff Regulations or any equivalent document containing details regarding:

Pay structure Allowances and perks Promotion policy Service conditions Leave policy Transfer policy Career progression and related HR provisions

3. Reservation in Promotions

a) Details of reservation provisions available in promotions for SC ST OBC EWS and PwBD categories in SEBI.

b) Certified copy of rules, circulars, roster system or policy documents governing reservation in promotions.

4. Regional office wise vacancy and employee strength

Kindly provide office wise and department wise details from Grade A level onwards for all departments containing:

a) Sanctioned strength

b) Working strength

c) Vacancies available

d) Category wise breakup UR SC ST OBC EWS PwBD if maintained for each Regional Office or Head Office of SEBI.”

3. **Reply of the Respondent** – The respondent, in response to query nos. 1(a-c) in the application, informed that SEBI has published Equal Opportunity Policy for PwBDs and the same is available on SEBI website. The respondent also provided the link for accessing the same. The respondent also informed that during recruitment, the detailed advertisement specifies the facilities and considerations extended to PwBDs. The respondent also provided the link for accessing the detailed advertisement for Recruitment Exercise, 2025. The respondent also stated that in addition to the above, general facilities like ramp at the entrance, lift with Braili, floor announcer and handrail and PwD accessible toilets are available at SEBI Office Building.

With regard to query no.2, the respondent informed that the information regarding Pay Scales, allowances, other benefits, career progression, leaves and other service conditions, transfer and placement policy in SEBI is available on SEBI website and provided the path for accessing the same.

With regard to query nos. 3 (a-b), the respondent informed that as per the extant DoPT guidelines (OM dated May 17, 2022) reservations do not apply to promotion by selection method from a Group 'A' post to another Group 'A' post. The respondent stated that in SEBI, the post of Officer Grade 'A' to Executive Director is considered as Group 'A' post. Accordingly, no reservation is applicable on promotion from Grade 'A' till Executive Director post.

With regard to query no. 4, the respondent informed that the details of current SEBI Officers along with their place of posting is available on SEBI website. The respondent also provided the link for accessing the same. Further, the respondent stated that sanctioned strength, vacancies and reservation are determined from time to time as per manpower requirements and work exigencies. The respondent also informed that vacancies at the level of grade A officers are disclosed publicly as part of the recruitment exercise.

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(a-c) and 2 in the application, I note that the requested information can be accessed by the appellant from the SEBI website. Hence, I find that the requested information is available in the public domain. In this context, I note that the Hon'ble Delhi High Court in *Registrar of Companies & ors. Vs. Dharmendra Kumar Garg & anr.* and the Hon'ble CIC in *Shri K Lall vs. Shri M K Bagri* (CIC/AT/A/2007/00112, order dated April 12, 2007) held that if the relevant information is available in the public domain, the same cannot be said to be information held by the public authority and consequently there is no obligation to provide such information to an applicant under the RTI Act. Accordingly, I do not find any deficiency in the said response of the respondent.
6. With regard to query no. 3, I note that the respondent has adequately addressed the query by providing the information available with him. Accordingly, I do not find any deficiency in the response of the respondent.
7. With regard to query no. 4, I note that working strength of officers in SEBI as a whole and department wise can be garnered by the appellant from the Directory of SEBI employees, available on SEBI website. The respondent has also informed that the sanctioned strength, vacancies and reservations are determined from time to time as per manpower requirements and work exigencies. The respondent also informed that vacancies at the level of grade A officers are disclosed publicly as part of the recruitment exercise. Accordingly, I find that the aforementioned requests were adequately addressed.

8. 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: July 22, 2026

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