

Template: PIO partial disclosure with severability

Base template for a reply applying Section 10 of the Right to Information Act, 2005, where a record contains both exempt and non-exempt information. This is a variant of the standard PIO reply, focused on the severability reasoning that appellate forums expect to see. Notes on state variants appear at the end.

When to use this

Section 10 of the Act provides that where a record contains information which is exempt from disclosure and information which is not, the Officer must provide access to that part of the record that does not contain any information that is exempt.

This template is used where the Officer has determined that a record engages one or more exemptions under Section 8 or Section 9, but the exempt information can be severed from the record, and the remainder furnished to the applicant.

A reply that invokes Section 10 must demonstrate on its face that the Officer has applied the mind to three questions. First, what are the specific portions that are exempt? Second, what is the specific exemption engaged, and why? Third, can the exempt portions be severed without distorting the record or defeating the purpose of the application? The answers to these three questions are the reasoning that appellate forums examine.

The template

[Letterhead of the Public Authority]

No. [File number] / [Year]

[Date]

To,

[Name of the applicant],

[Full address of the applicant].

Subject: Your RTI application dated [date of application] – reply under Section 7(1) read with Section 10 of the Right to Information Act, 2005.

Sir / Madam,

1. I refer to your application under Section 6(1) of the Right to Information Act, 2005 dated [date of application], received in this office on [date of receipt], and to the prescribed application fee of ten rupees tendered therewith.

2. The information sought in your application is held by this public authority. Certain portions of the record engage the exemption(s) specified in paragraph 4 below. Under Section 10 of the Act, the non-exempt portions of the record have been severed and are furnished as under.

Item [number]: [Item of the application, reproduced briefly.]

Reply: [Furnish the non-exempt information. Where the reply is a record, attach the redacted record as Annexure 1. Indicate the total number of pages, the pages on which redactions have been made, and the nature of the redactions in general terms.]

3. [If multiple items of information are covered by this reply, repeat paragraph 2 for each item.]

4. The reasons for the partial disclosure are set out below, as required by Section 7(8)(i) of the Act and in compliance with the Officer's duty to record reasons.

a. The record of item [number] contains information relating to [describe the nature of the exempt information in general terms]. This information is exempt from disclosure under Section [cite specific clause, such as 8(1)(a), 8(1)(e), 8(1)(j), or Section 9] of the Act. The facts engaging the exemption are that [set out the specific facts, with reference to the information without disclosing it].

b. Public interest in disclosure under Section 8(2) of the Act has been considered. On the facts of the case, the public interest in disclosure does not outweigh the protected interest, for the following reasons: [set out the proportionality reasoning briefly, with reference to Justice K.S. Puttaswamy v. Union of India (2017) 10 SCC 1 where the matter engages Section 8(1)(j)].

c. The exempt portions can be and have been severed from the non-exempt portions of the record. Severance does not defeat the purpose of the application, as the non-exempt portions, taken as a whole, address the substance of the information sought.

5. You are advised that if you are aggrieved by the decision communicated in this reply, you may prefer a first appeal under Section 19(1) of the Act within thirty days of the receipt of this reply. The first appeal lies to the First Appellate Authority of this public authority, whose particulars are as follows.

Name and designation: [Name and designation of the First Appellate Authority]
Office address: [Full postal address]
Email: [Email address]
Telephone: [Telephone number]

6. A Second Appeal, if any, will lie to [the Central Information Commission, New Delhi / the State Information Commission, (name of the State)] under Section 19(3) of the Act, within ninety days from the date on which the decision of the First Appellate Authority ought to have been made or was actually received.

Yours faithfully,

[Signature]
[Name of the Central Public Information Officer]
[Designation]
[Telephone number]
[Email]

Enclosures:

1. Annexure 1: Redacted record of item [number], in [number] pages, with redactions marked on page [x], page [y], and page [z].
2. [Any other annexure.]

Legal basis

- **Section 10** of the Act provides that where a request for access to information is rejected on the ground that it is in relation to information which is exempt from disclosure, then,

notwithstanding anything contained in the Act, access may be provided to that part of the record which does not contain any information which is exempt from disclosure under the Act and which can reasonably be severed from any part that contains exempt information.

- **Section 7(8)(i)** of the Act requires the Officer to communicate the reasons for any rejection.
- **Section 8(2)** of the Act provides the public interest override, through which public interest reasoning now operates after the amendment to Section 8(1)(j) effected by the Digital Personal Data Protection Rules, 2025.
- **Justice K.S. Puttaswamy v. Union of India** (2017) 10 SCC 1 affirms the right to privacy as a fundamental right and lays down the proportionality test that applies when the right to privacy is asserted as a restriction on the right to information.

Common mistakes

- **Failing to identify the exempt portions with particularity.** A bare assertion that the record contains exempt information is not enough. The Officer must identify, in general terms, the nature of the exempt information, and the specific exemption engaged. Appellate forums cannot assess severability without this detail.
- **Refusing the entire record.** Where severability is possible, a refusal of the entire record is liable to be set aside. The statutory duty under Section 10 is to sever and furnish the non-exempt portions.
- **Failing to record the proportionality reasoning under Section 8(2).** After the amendment to Section 8(1)(j), public interest reasoning operates through Section 8(2). Where the matter engages public interest, the Officer must address Section 8(2) on motion, and record why the public interest does or does not outweigh the protected interest.
- **Using redaction to conceal the extent of the record.** Practitioners are advised to state, on the face of the reply, the total number of pages in the redacted record and the pages on which redactions have been made. Concealing the scale of the record is a ground on which appellate forums remand the matter.
- **Inconsistent redaction.** Where the same category of information is redacted in one place and disclosed in another, the Officer's reasoning becomes vulnerable. A consistent approach to redaction across the record is essential.

Related pages

- Severability
- Grounds for rejection
- Justification for denial is mandatory
- Privacy under the RTI Act
- DPDP Rules 2025 and the amendment to Section 8(1)(j)
- Template: standard reply within thirty days

Notes on state variants

- **Section 10 is applied uniformly across Central and State jurisdictions.** There is no State variation in the statutory text.
- **Format of redaction.** Central practice is to use a black rectangle over the redacted text in a photocopy of the record. Some States use a covering sheet with the item heading and a

description of the redacted content. Either method is acceptable, so long as the extent of redaction is apparent on the face of the record.

- **Annexure numbering.** Central practice numbers annexures in Arabic numerals. Some State practice uses Roman numerals. Follow the convention of the public authority.

Last reviewed

19 April 2026

rti, templates, pio, section-10, severability, 2026



Right to Information Wiki

The working reference for India's Right to Information Act, 2005.



Read online

<https://www.righttoinformation.wiki/templates/pio-reply-partial-denial>

Main website

<https://www.righttoinformation.wiki/>

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