

Freedom of Information Act 2000 (Section 50)

Decision Notice

Date: 21 December 2009

Public Authority: Ministry of Justice Access Rights Unit 1st Floor Clive House 70 Petty France London SW1H 9HD

Summary

On the 19 October 2005 the complainant requested information from a database of the Clearing house of the Ministry of Justice ('MOJ'). The MOJ originally refused the information under section 36(2)(b) and (c), but during the Commissioner's investigation changed their reliance to section 12 of the Act whilst informing the complainant of this. The Commissioner found the MOJ in breach of section 17(5) of the Act for the late application of section 12, and s16(1) for failure to offer advice and assistance but considers the MOJ correctly applied section 12(1) of the Act to the request. He ordered the MOJ to provide appropriate advice and assistance as required by section 16(1) of the Act.

The Commissioner's Role

1. The Commissioner's duty is to decide whether a request for information made to a public authority has been dealt with in accordance with the requirements of Part 1 of the Freedom of Information Act 2000 (the "Act"). This Notice sets out his decision.

Background

2. The complainant made a request for information contained within the Clearing House's Case Management System ('CMS'). The Central Clearing House was established by government in 2004. Part of the Ministry of Justice, its primary



functions relate to the Freedom of Information Act and the Environmental Information Regulations. The remit of the unit is to provide expert advice on complex, sensitive, or high profile requests for information; This unit ensures consistency across central government in the handling of these types of request; it works to develop, through litigation, the boundaries of the legislation in accordance with government policy. ¹ The CMS is the Clearing House's data base, which contains information on those cases referred to in the Clearing House and the case analysis conducted and advice given to government departments by the Clearing House.

The Request

3. On the 19 October 2005 the complainant requested the following:

" I've now reviewed the CMS specification version 2.6 and wish to make a request under the Freedom of Information Act. I would be grateful if you could acknowledge this request and provide the file number assigned to it, as well as the due date for response.

I wish to receive the fields of data held within the DCA² Clearing House CMS that are listed in the attached page, for all cases contained within the CMS on the date of processing of this request. I wish to receive this information in electronic form only, as a tab-delimited text file, or as an Excel file.

I would be pleased to discuss ways of simplifying this request. In particular, I am prepared to remove fields that are likely to contain some data subject to a FOIA exemption."

The Commissioner has attached a copy of CMS specification version 2.6 at Annex 2 of this decision notice.

- 4. On the 17 November 2005 the MOJ issued a refusal notice relying upon section 36(2)(c) of the Act.
- 5. On the 17th November 2005 the complainant requested an internal review.
- 6. On the 13 April 2006 the MOJ issued its internal review to the complainant relying on section 36(2)(b) and (c) to exempt the requested information.

¹ 'Procedural Guidance: Chapter 11, Clearing House Toolkit http://www.justice.gov.uk/guidance/docs/foi-clearing-house.pdf

² Responsibilities of the Department of Constitutional Affairs transferred to the Ministry of Justice in May 2007.



The Investigation

Scope of the case

- 7. On the 25 January 2006 the complainant contacted the Commissioner to complain about the way his request for information had been handled in that it was denied by the MOJ. The complainant also raised the issue of delay on the part of the MOJ in carrying out an internal review.
- 8. During the course of the Commissioner's investigation the MOJ undertook to consider releasing some information to the complainant outside of the scope of the Act. However at the time of writing of this decision notice the Commissioner is not aware of any information which has been released to the complainant .In any case, as any such discretionary disclosures would be made outside of the Act, they have no bearing upon the findings in this Notice.

Chronology

- 9. On the 29 January 2008 the Commissioner wrote to the MOJ beginning investigation of this case and asking for clarification on the MOJ's handling of the request and its use of exemptions. The Commissioner drew the MOJ's attention to decision notice FS50087614 in relation to a decision made in respect of a request to the Cabinet office for similar information. The Commissioner urged the MOJ to consider possible informal resolution of this case and to consider if any information could be released in this case.
- 10. On the 27th February 2008 the MOJ replied to the Commissioner asking for an extension to the time limit for responding to his letter
- 11. On the 29th February 2008 the MOJ advised the Commissioner that it no longer wished to rely on section 36 in respect of this information. The MOJ stated that it now wished to rely on section 12 of the Act. The MOJ provided some reasoning to the Commissioner in support of its decision to apply section 12. The MOJ undertook to alert the complainant to this change of reliance.
- 12. After viewing this response the Commissioner made arrangements with the MOJ to inspect this database. The Commissioner inspected the database on the 16 April 2008 in London.
- 13. Following this inspection the MOJ provided the Commissioner with further detail concerning the application of section 12 and the costs of fully complying with the complainant's request.

Analysis



Substantive Procedural Matters

14. Section 17(5) of the Act requires that a public authority which seeks to rely upon a claim that a request does not have to be complied with by virtue of cost, must, within the appropriate time limit, give the applicant a notice stating that section 12 applies. The Commissioner has noted that the MOJ failed to state to the complainant that it was relying on section 12 within the statutory time for compliance and indeed only changed its reliance when his investigation of the matter had begun. The Commissioner therefore finds the MOJ in breach of section 17(5) of the Act.

Section 12

- 15. Section 12(1) of the Act does not oblige a public authority to comply with a request if the authority estimates the cost of complying with the request would exceed the appropriate limit. The Freedom of Information and Data Protection (Appropriate Limits and Fees) Regulations 2004 ('the Fees Regulations') set a limit of £600 to the cost of complying with a request for government departments. The cost is calculated at a rate of £25 per person per hour, which is equivalent to 24 hours of staff time. The figure of £600 relates only to the appropriate limit; it does not relate to the fees that a public authority may charge for providing information.
- 16. Under regulation 4(3) of the Fees Regulations, in estimating the cost of complying, a public authority can take the following into account:
 - determining whether it holds the information requested;
 - locating the information, or a document containing it;
 - retrieving the information, or a document containing it; and
 - extracting the information from a document containing it.
- 17. Section 12 makes it clear that a public authority does not have to make a precise calculation of the cost of complying with a request. In paragraphs 9 to13 of the decision in the case of Roberts v the Information Commissioner (EA/2008/0050) the Information Tribunal made the following points, all of which are endorsed by the Commissioner: (i) Only an estimate is required and not a precise calculation; (ii) the costs estimates must be reasonable and only based on those activities described in regulation 4(3); (iii) time spent on considering exemptions or redaction cannot be taken into account; (iv) estimates cannot take into account costs relating to data validation or communication; (v) the determination of a reasonable estimate can only be considered on a case by case basis; and (vi) ny estimate should be 'sensible, reasonable and supported by cogent evidence'³.

³ Randall v Information Commissioner (EA/2007/0004)



- 18. In the present case the MOJ has set out in some detail the processes that it believes it would need to undertake to provide the complainant with the information that he seeks in relation to his 75 requested fields of data. MOJ estimated that it would require over 306 hours to provide the complainant with the information of the description specified in his request. MOJ stated this estimate was made on the basis that it would have to create a number of separate reports to answer the complainant's request and also that, where reports could not be created, it would need to extract information manually.
- 19. MOJ stated to the Commissioner that it had become evident, when reviewing the Clearing House's Case Management System (CMS), that it was not possible to use its electronic search function to create a list of all relevant cases which also showed all the 75 data fields requested by the complainant. The MOJ highlighted to the Commissioner the limitations of the electronic search function on its CMS system. It stated that using the electronic search function it could create a report that would show the following 3 data fields for all the cases within the scope of the request, 'Clearing House Reference Number', 'Department' and 'Status'. It stated that in order to provide details recorded in other data fields however, it would need to create further separate reports. It stated that a further 68 reports could be run, which would provide the data for 57 of the requested data fields, and that it would take an estimated 4 minutes per report to extract information using this method. It provided the following examples to illustrate this point :

"For example, a separate report would have to be created to show which files were referred as *Sensitive*, and further still, eight separate reports would need to be created to show which files fall under which eight categories of *Requester's Organisation*. The CMS search function does not allow the user to create reports demonstrating <u>all</u> files <u>and</u> the *requester's organisation*. Searches are only possible by *requestor's organisation*, that is, users may only search for files listed as "Academic".

- 20. The MOJ further pointed out to the Commissioner that a small number of search functions do not allow the user to generate a list of cases under a set field in the manner explained above, and that for these fields manual file searches would be required. The MOJ then gave examples of this to the Commissioner.
- 21. One such example they pointed out to the Commissioner during his inspection included the field entitled 'date referred'. MOJ stated that CMS does not hold a specific search function that creates a report demonstrating 'date referred' for all files. MOJ stated that this was applicable to 5 of the fields requested by the complainant. In order to find that information MOJ would have to manually search all of the 3,017 files within the scope of the complainant's request. In relation to the manual file search itself the MOJ highlighted that this is not straight forward either. MOJ gave an example in relation to the requested field 'Department Case Reference'. In order to locate this information the MOJ stated that the user might need to access and search all of the documents contained within the file as the data is not recorded in a prominent or primary position within the file. MOJ estimated that it would take 8 minutes to extract information using this method.



- 22. MOJ has stated to the Commissioner that it would require over 306 hours to provide the complainant with the information of the description specified in his request. It considers that it would take 4.5 hours to create 68 separate reports and a further 301.70 hours to create a report containing the data available only by a manual search of the 3017 files.
- 23. In assessing these overall figures the Commissioner considers that MOJ have slightly miscalculated the total time that it would have taken them based on those figures provided to him by MOJ. Given that MOJ state they would estimate it takes 4 minutes per report to create each of the 68 separate reports, the Commissioner calculates this to amount to 272 minutes, which is 4.53 hours. Taking MOJ's estimation of 8 minutes per file to create, extract and record the relevant data in each of the 3,017 manual files, this would total 402.27 hours and not 301.7 hours as estimated by the MOJ. In any event, using either figure, the time involved would be significantly higher than that provided by the appropriate limit.
- 24. The Commissioner accepts that 4 minutes per report is a reasonable estimate. He considers that 8 minutes per manual file is a generous estimate, but as the number of manual files involved amounts to 3,017, even an estimate of 1 minute per file would far exceed the appropriate limit. He therefore concludes that, using the method set out by the MOJ, it was reasonable for it to estimate that the costs of responding to the request would exceed the appropriate limit.

Alternative Methods of extracting the requested information

25. As part of his inspection the MOJ granted the Commissioner access to its CMS system. During this inspection the Commissioner discussed with the MOJ the possibility of having this information provided under the cost limit by utilising specialist software or indeed having internal/external technicians devise a programme which could potentially provide the information requested within the cost limit. The Commissioner is mindful that the Information Tribunal have considered the issue of employing alternative methods of extracting requested information. In the case of Alasdair Roberts v the Information Commissioner the Tribunal (EA/2008/0050) provided general comments on alternative methods of extraction:

"(a) the complainant set the test at too high a level in requiring the public authority to consider all reasonable methods of extracting data; (b) that circumstances might exist where a failure to consider a less expensive method would have the effect of preventing a public authority from relying on its estimate...(para 15)

26. The Commissioner was also copied into correspondence dated 09 June 2008 between the MOJ and the complainant, in which the complainant discussed with the MOJ its reliance on section 12. The complainant raised issues about MOJ pursuing alternative methods of extracting the requested information. The complainant raised several points with the MOJ about providing the information namely:



- (i) That some of the requested data may be provided using the standard-report generating capabilities already built into CMS. (The complainant has acknowledged that that standard reporting only provides some critical fields and some of these fields may be subject to other exemptions.)
- (ii) Whether it is possible for technical staff within government to extract data from the underlying data base. The complainant drew the MOJ's attention to the point that contractors often do not create a wholly original software programme. Rather they construct an interface which is layered on top of a database that conforms to a standard format, and can be interrogated using other tools usually available to government such as 'Crystal Reports'
- (iii) The complainant assumed the MOJ has its own technical staff familiar with databases
- (iv) If the above suggestions were not feasible then the complainant was willing to discuss ways of some of the information being provided by the standard-report generating capability.
- 27. The Commissioner considers that if a public authority requires contract staff to determine whether the requested information is held or in locating, retrieving or extracting the information, the full cost charged by the contract staff cannot be taken into account when calculating costs under section 12. By virtue of Regulation 4(4) of the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 the use of any staff time can only be included at the rate of £25 per hour. The Commissioner considers that the full costs of purchasing specialist software to carry out these activities can be taken into account in calculating the costs limit under s12. Regulation 4(3) states that a public authority can take into account costs it 'reasonably expects to incur'.
- 28. As noted above the MOJ's estimate was based upon its use of existing CMS search and reporting functions and, where these proved inadequate, resorting to manual searches. The Commissioner considers that, although a public authority is not obliged to consider all reasonable methods of extracting data, a cost estimate could potentially be rendered invalid in circumstances where an obvious, less expensive, method of extraction is not considered.
- 29. With this in mind the Commissioner discussed with MOJ the possibility of devising specialist Structured Query Language ('SQL') to extract the requested information from the CMS database. The MOJ discussed with the Commissioner further detail about its databases and its IT provision.
- 30. MOJ provided the Commissioner with the detail of its enquiries into this possibility. It obtained confirmation from its IT contractor that the costs of creating a bespoke reporting function to meet the complainants request would exceed the appropriate limit. It also provided details of previous enquiries it had made of its external IT contractors about the costs involved in making specific alterations to this database's reporting functions. Whilst these costs did not specifically detail the number of staff hours involved, the Commissioner notes that they were far in excess of the appropriate limit. In light of this, he considers it reasonable to conclude that the costs of any contractor staff time involved in meeting this request (charged at the allowable rate of £25 per hour) would exceed the appropriate limit, and that therefore the MOJ's estimate is not invalidated by a



failure to consider a less expensive, method of complying with the request. The Commissioner's acceptance of this without a specific breakdown of external staff hours has been made on the facts of this particular case. Had the estimate not already been provided by the external contractors, had it been closer to the appropriate limit, or had the Commissioner been considering a primary estimate, rather than an alternative method of extracting the information, then it is unlikely that he would accept an estimate that failed to specifically detail the number of staff hours.

31. On the basis of the detail contained in this estimation by MOJ the Commissioner is satisfied that section 12 is engaged and that the estimate provided by MOJ was a reasonable one. The Commissioner is satisfied that the MOJ's estimate would cost in excess of the appropriate fee limit. The Commissioner is also satisfied that the estimate is not invalidated by a failure to consider an obvious, less, expensive, alternative method of providing the requested information. The Commissioner therefore considers all of the information requested by the complainant to be covered by section 12(1) of the Act.

Advice and assistance in relation to s12

- 32. Section 16(1) of the Act provides that a public authority should provide reasonable advice and assistance to those making requests for information. Section 16(2) provides that any public authority which, in relation to the provision of advice and assistance, conforms with the Code of Practice issued under section 45 of the Act, shall be taken to have complied with section 16(1).
- 33. The section 45 Code of Practice provides that where a public authority is not obliged to comply with a request for information because to do so would exceed the appropriate limit, then the public authority should provide advice and assistance to help the applicant to submit a refined request.
- 34. In the Commissioner's view this does not mean that a public authority is obliged to provide information up to the cost limit, or that failure to provide advice and assistance invalidates a public authority's reliance upon section 12. Rather it means that a public authority that relies upon section 12 should, where possible, provide reasonable advice and assistance so that an applicant may be able to submit a new request that would fall within the costs limit. Failure to do so will be a breach of section 16, but will have no impact upon the validity of the section 12 claim. This issue was considered in the case of Alasdair Roberts v the Information Commissioner where the Tribunal agreed with the Commissioner's position and commented that

"There is nothing in the language of section 12 itself to suggest that the estimate may be challenged for any reason other that that it fails to comply with the Regulations. Nor does section 16 specify that failure to comply with its requirement should invalidate an estimate. In fact no sanction is mentioned in that section and it is to be inferred that the only available sanctions are those set out in Part 1V of the FOIA, which make no reference to any consequential impact of breach on the applicability of other provisions."



The relevant part of the Code of Practice... indicated that the requirement to give advice only arises once the public authority has reached the stage where section 12 applies ('Where an authority is not obliged to comply with a request for information...) Neither the statute not the Code of Practice contain any suggestion that avoiding the obligation to comply is conditional on first complying with the Code of Practice or that a public authority must consult with the person seeking information as part of the process by which it reaches an estimated costs figure. This is entirely consistent with the purpose of the Code of Practice, (which is to provide guidance only), and with the language of section 16 itself, (which makes it clear in subsection (2) that the only impact of the Code of Practice is that a public authority which complies with it will be found to have provided the advice and assistance necessary to avoid a breach of subsection (1)."

35. The Commissioner considers that whilst the MOJ may have considered releasing some information to the complainant outside of the Act, it has failed to provide advice and assistance to enable the complainant to submit a new request that would fall under the costs limit. He notes that MOJ has admitted to him in its correspondence of the 29th February 2008 that it had not provided advice and assistance to the complainant in compliance with section 16(1) of the Act when initially considering this request. The Commissioner therefore considers that the MOJ have breached section 16(1) of the Act in this regard as it would have been reasonable for the MOJ to have been more forthcoming in explaining the detail of the database to the complainant when he initially made his request so that he could submit a new request which only relied upon existing search functions and thus would not exceed the appropriate limit. In particular the MOJ could have advised the complainant which 57 data fields could be provided within the costs limit.

Other exemptions.

36. During his inspection the MOJ pointed out to the Commissioner several fields of data which they were minded to consider applying further exemptions to. As the Commissioner is satisfied that the cost limit is exceeded in this particular request he has not considered any additional exemptions in this case.

The Decision

37. The Commissioner's decision is that the public authority dealt with the following elements of the request in accordance with the requirements of the Act:

The MOJ correctly applied section 12(1) to the requested information.

However, the Commissioner has also decided that the following elements of the request were not dealt with in accordance with the Act:

In applying section 12(1) at a late stage (during the Commissioner's investigation) the MOJ are in breach of section 17(5) of the Act. The Commissioner also considers that the MOJ breached section 16 (1) of the Act by not offering the



complainant advice and assistance to refine his request when it was initially made.

Steps Required

38. The MOJ should now provide the complaint with appropriate advice and assistance, as required by section 16(1), and in accordance with Part II of the section 45 Code of Practice.

Failure to comply

39. Failure to comply with the steps described above may result in the Commissioner making written certification of this fact to the High Court (or the Court of Session in Scotland) pursuant to section 54 of the Act and may be dealt with as a contempt of court.

Other matters

- 40. Although they do not form part of this Decision Notice the Commissioner wishes to highlight the following matters of concern:
- 41 The complainant raised the issue with the Commissioner about the delay in relation to the completion of the Internal review in this case. The complainant requested an internal review on the 17 November 2005 and one was not carried out until the 13 April 2006. The Commissioner has noted that the MOJ apologised to the complainant for the delay and would like to take this opportunity to remind the MOJ of the following sections of the sections of the Code of Practice issued under section 45 of the Act ('the Code') in relation to timeliness of carrying out an internal review procedure. Part V1, paragraphs 41 and 42 of the Code states:

"41: In all cases, complaints should be acknowledged promptly and the complainant should be informed of the authority's target date for determining the complaint. Where it is apparent that determination of the complaint will take longer than the target time (for example because of the complexity of the particular case), the authority should inform the applicant and explain the reason for the delay. The complainant should always be informed of the outcome of his or her complaint.

42: Authorities should set their own target times for dealing with complaints; these should be reasonable, and subject to regular review. Each public authority should publish its target times for determining complaints and information as to how successful it is with meeting those targets."



Right of Appeal

42. Either party has the right to appeal against this Decision Notice to the Information Tribunal. Information about the appeals process may be obtained from:

Information Tribunal Arnhem House Support Centre PO Box 6987 Leicester LE1 6ZX

Tel: 0845 600 0877 Fax: 0116 249 4253 Email: <u>informationtribunal@tribunals.gsi.gov.uk</u>. Website: <u>www.informationtribunal.gov.uk</u>

If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.

Any Notice of Appeal should be served on the Tribunal within 28 calendar days of the date on which this Decision Notice is served.

Dated the 21st day of December 2009

Signed

Lisa Adshead Senior FOI Policy Manager

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF



Legal Annex

Exemption where cost of compliance exceeds appropriate limit

Section 12(1) provides that -

"Section 1(1) does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit."

Section 12(2) provides that – "Subsection (1) does not exempt the public authority from its obligation to comply with paragraph (a) of section 1(1) unless the estimated cost of complying with that paragraph alone would exceed the appropriate limit."

Section 12(3) provides that -

"In subsections (1) and (2) "the appropriate limit" means such amount as may be prescribed, and different amounts may be prescribed in relation to different cases." **Section 12(4)** provides that –

"The secretary of State may by regulations provide that, in such circumstances as may be prescribed, where two or more requests for information are made to a public authority

- (a) by one person, or
- (b) by different persons who appear to the public authority to be acting in concert or in pursuance of a campaign,

the estimated cost of complying with any of the requests is to be taken to be the estimated total cost of complying with all of them."

Section 12(5) - provides that

"The Secretary of State may by regulations make provision for the purposes of this section as to the costs to be estimated and as to the manner in which they are estimated.

Duty to provide Advice and Assistance

Section 16(1) provides that -

"It shall be the duty of a public authority to provide advice and assistance, so far as it would be reasonable to expect the authority to do so, to persons who propose to make, or have made, requests for information to it".

Section 16(2) provides that -

"Any public authority which, in relation to the provision of advice or assistance in any case, conforms with the code of practice under section 45 is to be taken to comply with the duty imposed by subsection (1) in relation to that case".

Refusal of a request.

Section 17(5) provides that -

"A public authority which, in relation to any request for information, is relying on a claim that section 12 or 14 applies must within the time for complying with section 1(1), give the applicant a notice stating that fact"



Annex 2

Copy of Fields contained within the DCA Clearing House CMS Data Base forming part of the complainant's request.

FIELDS CONTAINED WITHIN DCA CLEARING HOUSE CMS SOURCE: DCA FOICMS REQ 2.6

Fields with a double strike-through (example) are not requested. Case Details / Clearing House Reference (Text field) Case Details / Department (Text field) Case Details / Department Case Reference (Text field) Case Details / Date Received By Department (Date field) Case Details / Date Referred (Date field) Case Details / Requested Response Date (Date field) Case Details / Response Due Date (Date field) Case Details / Request Category (Text field) Case Details / Correspondence Type (Text field) Case Details / Requester's Name Case Details / Requester's Organisation (Text field) Case Details / Summary (Text field) Case Details / Case Status (Text field) Case Details / Case Assessment (Triage) (Text field) Case Details / Case Owner (Text field) DCA To Process / Time Extension / Public Interest Assessment (Binary) DCA To Process / Time Extension / Volume&Complexity (EIR) (Binary) DCA To Process / Case Analysis / Sensitive (Binary) DCA To Process / Case Analysis / Suspected Round-Robin (Binary) DCA To Process / Case Analysis / S. 23 Certificate (Binary) DCA To Process / Case Analysis / Check Classification (Binary) DCA To Process / Case Analysis / NCND (Binary) DCA To Process / Case Analysis / Precedent Setting (Binary) DCA To Process / Case Analysis / S. 24 Certificate (Binary) DCA To Process / Case Analysis / Check Exemptions (Binary) DCA To Process / Case Analysis / Simultaneous Release (Binary) DCA To Process / Case Analysis / Departments Involved / DCMS (Binary) DCA To Process / Case Analysis / Departments Involved / DFES (Binary) DCA To Process / Case Analysis / Departments Involved / DOH (Binary) DCA To Process / Case Analysis / Departments Involved / IND (Binary) DCA To Process / Case Analysis / Departments Involved / DWP (Binary) DCA To Process / Case Analysis / Departments Involved / VOSA (Binary) DCA To Process / Case Analysis / Departments Involved / DEFRA (Binary) DCA To Process / Case Analysis / Departments Involved / FCO (Binary) DCA To Process / Case Analysis / Departments Involved / Other (Text field) DCA To Process / Case Meeting Required? (Binary) DCA To Process / Case Meeting Required / Departmental Policy Advisers (Binary) DCA To Process / Case Meeting Required / Departmental Legal Advisers (Binary) DCA To Process / Case Meeting Required / Departmental Press Advisers (Binary) DCA To Process / Case Meeting Required / DCA Policy Advisers (Binary) DCA To Process / Case Meeting Required / DCA Legal Advisers (Binary) DCA To Process / Case Meeting Required / DCA Press Advisers (Binary) DCA To Process / Case Meeting Required / TSol Legal Advisers (Binary) DCA To Process / Case Meeting Required / GICS Press Advisers (Binary) DCA To Process / Case Meeting Required / Other Policy Advisers (Text field) DCA To Process / Ministerial Clearance Requirements / Permanent Secretaries (Binary) DCA To Process / Ministerial Clearance Requirements / NSLG (Binary)



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Case Assessment (Appeals) / Ministerial Clearance Requirements / Cabinet (Binary) Case Outcomes / Advice and Assistance (Binary) Case Outcomes / Fee Limit (Binary) Case Outcomes / Vexatious Applicant (Binary) Case Outcomes / Repeated Request (Binary) Case Outcomes / Release Information in Full (Binary) Case Outcomes / Release Information in Part (Binary) Case Outcomes / Simultaneous Release Required (Binary) Case Outcomes / Withhold Information (Binary) 3 Case Outcomes / NCND (Binary) Case Outcomes / S.23 Certificate (Binary) Case Outcomes / S.24 Certificate (Binary) Case Outcomes / Ministerial Veto (Binary) Case Outcomes / Other Outcome (Text field) Exemptions / FOI (binary) Exemptions / EIR (binary) Exemptions / DPA (binary)

Approval / Date Approved (Date field)