Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 15 June 2016

Public Authority: Department for Education
Address: Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Decision (including any steps ordered)

1. The Commissioner has previously considered the decision of the Department for Education (DfE) to withhold some documents covered by requests made on 11 August 2014 for information relating to the proposal for the Independent Schools Standards (ISS) and the corresponding consultation exercise. On 21 July 2015 the Commissioner issued a decision notice under the reference FS50566201 in which he found that the DfE had correctly applied the exemptions to disclosure set out at section 35(1)(b) (ministerial communications) and sections 36(2)(b)(i) and (ii) (prejudice to the effective conduct of public affairs) of FOIA. Referencing the passage of time that had elapsed since that decision, the complainant in this case has made a further request for the withheld information. With the exception of some information which has been disclosed, the DfE considered that the requested information continued to be exempt information under the exemptions previously cited but also stated that section 36(2)(c) of FOIA applied to parts of the requested information. With respect to each of the exemptions cited, the DfE exercised the public interest test and concluded that the public interest still favoured withholding the information.

2. The Commissioner has decided that section 35(1)(b) and, elsewhere, sections 36(2)(b)(i) and (ii) are engaged but not section 36(2)(c) of FOIA. For each of the exemptions that have been found to apply, the Commissioner has determined that, in all the circumstances, the public interest in disclosure outweighs the public interest in favour of maintaining the exemptions. The Commissioner therefore requires the DfE to disclose the requested information with the exception of any information that the DfE considers should be withheld in accordance with

its standard policy on the publication of personal data (see paragraph 6).

3. The public authority must take this step within 35 calendar days of the date of this decision notice. Failure to comply may result in the Commissioner making written certification of this fact to the High Court pursuant to section 54 of the Act and may be dealt with as a contempt of court.

Request and response

4. On 14 August 2015, the complainant wrote to the DfE and requested information in the following terms:

> 1. *Please will you supply me with a copy of:*
>
> *(a) a letter from Lord Nash to Nick Clegg, Deputy Prime Minister and Vince Cable, the Secretary of State for Business, Innovation and Skills dated 30 May 2014 relating to the public consultation Proposed New Independent School Standards Launch date 23 June 2014.*
>
> *(b) a timetable paper produced for Lord Nash; and*
>
> *(c) a submission to Lord Nash seeking his approval of the consultation package and consent to seek approval from the Home Affairs Committee (HAC) and the Reducing Regulation Committee (RRC).*
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> 2. *The above documents are referred to in the ico Decision Notice ref: FS50566201 ('DN')*[1] *and dated 21 July 2015 – paras. 16 and 36. The DN upheld the DfE's decision to withhold them when the original FOIA request was made on 11 August 2014.*
>
> […]
>
> 6. *It is respectfully submitted that a year after the original request the points the DN held in favour of the DfE now have far less weight compared with those in favour of disclosure on public interest grounds as stated in the DN.*

[1] https://ico.org.uk/media/action-weve-taken/decision-notices/2015/1432185/fs_50566201.pdf

5. The DfE replied to the complainant on 11 September 2015 and informed him that the requested information engaged the exemption to disclosure set out at section 36 of FOIA. The exemption is subject to the public interest test and the DfE explained that FOIA permits a public authority to extend the statutory period of 20 working days for a response where further time was required to decide where the balance of the public interest lay. The DfE estimated that it would take an additional 20 days to make a decision. On 9 October 2015 the DfE wrote to the complainant to inform him that it required another extension, estimating that a further 20 days would be needed.

6. The complainant acknowledged the time extension the same day but advised that he would seek an internal review if any further delays occurred. To help facilitate a response, the complainant clarified that he was content for all the names in the requested documents to be redacted. The DfE responded by explaining that it was the Department's standard practice to redact any names of staff who were not in the Senior Civil Service and to leave unredacted those of senior staff and ministers.

7. The DfE provided its formal response to the request on 5 November 2015. This reiterated that section 36 of FOIA applied to the requested information and further informed the complainant that, upon the completion of consideration of the public interest test, the DfE had found that the public interest favoured maintaining the exception.

8. The complainant contacted the DfE on 12 November 2015 to ask that it review the decision to withhold the requested information. In particular, he encouraged the DfE to reflect on the importance of the timing of the request in the exercising of the public interest test. The DfE therefore carried out an internal review, the outcome of which was provided to the complainant on 10 December 2015. This upheld the DfE's original position.

Scope of the case

9. The complainant contacted the Commissioner to complain about the DfE's refusal to comply with his requests for information.

10. During the course of the Commissioner's investigation, the DfE advised that in relation to request 1(a), which asked for a copy of the letter from Lord Nash, it meant to rely on section 35(1)(b), or sections 36(2)(b)(ii) and (c) in the alternative, to withhold the document.

11. It was further noted that the submission to Lord Nash mentioned in request 1(c) contained a number of Annexes that the DfE was willing to

disclose (the only exception being Annex A which represented the letter asked for at request 1(a)). This information was subsequently released to the complainant.

12. The Commissioner's examination of the DfE's grounds for withholding the remaining information covered by the scope of the requests is set out in the body of this notice.

Reasons for decision

13. The Commissioner's analysis of the DfE's position is broken down by order of the exemption applied.

Section 35(1)(b) – government policy

Request 1(a) letter from Lord Nash (30 May 2014)

14. The DfE has argued that Lord Nash's letter engages section 35(1)(b) of FOIA. If this exemption was found not be engaged, however, the DfE claimed sections 36(2)(b)(ii) and (c) as an alternative.

15. The complainant has accepted that the Information Commissioner is required to consider the application of an exemption that, in respect of section 35(1)(b), was only introduced after a complaint to the Commissioner had been made. The complainant has submitted though that the Commissioner might give the application little weight given that the DfE had already cited the exemption in response to an earlier version of the request which had covered the same information and had still failed on two occasions – at the initial response and internal review stages - to raise section 35(1)(b) in relation to the request currently under consideration. The Commissioner disagrees with the complainant's submission, however. Just as he does not have any discretion as to whether to accept for consideration the late application of an exemption, so the Commissioner is bound to consider fully and objectively a public authority's reasons for applying the exemption. It follows from this that any determination must therefore turn on the facts of the case, the strength of the arguments provided and the Commissioner's own analysis of the withheld information.

16. Section 35(1)(b) states that information held by a government department or by the National Assembly for Wales is exempt information if it relates to Ministerial communications. FOIA explains that in this context 'Ministerial communications' means any communications between the Ministers of the Crown and includes, in particular, proceedings of the Cabinet or of any committee of the Cabinet.

17. To support its position, the DfE has pointed out that the Commissioner in FS50566201 had agreed the exemption applied to the same information. In his decision notice, the Commissioner made reference to the principle of collective responsibility in the Ministerial Code (paragraph 17) and the way in which the Ministerial Code applied to consultations (paragraph 19). The Commissioner went on to conclude at paragraph 20 that the document quite clearly fell within the definition of 'Ministerial communications'.

18. The Commissioner is content that the letter continues to be covered by the exemption. He has therefore gone on to consider the public interest test.

19. With regard to the possible application of the exemptions in section 36(2) cited by the DfE, the Commissioner notes that although they protect similar interests sections 35 and 36 are mutually exclusive. This means that if any part of section 35 is engaged, section 36 cannot also apply – even if the public interest results in disclosure under section 35. In light of his finding on the engagement of section 35(1)(b), therefore, the Commissioner has not had to consider the alternative application of section 36 in the context of this request.

The balance of the public interest test

20. In FS50566201 the Commissioner acknowledged that the respective weights of the competing public interest arguments, for and against disclosure, were finely balanced.

21. The Commissioner noted in the decision notice that the requested information relates to the DfE's decision to launch the public consultation on the ISS in two stages and the resolution to have a shorter consultation period for that aspect of the standards pertaining to the spiritual, moral, social and cultural development of pupils (SMSC) (Part 2 of ISS). The complainant argued, and in effect continues to argue, that the public interest in disclosure was strengthened because of concerns about what was a particularly short consultation period for Part 4 of the ISS and its launch date close to the school summer term with a closing date in the summer holiday.

22. The Commissioner considered that the issues raised by the complainant carried significant weight, particularly when the proposals were viewed against the backdrop of the so-called Trojan Horse controversy in Birmingham in 2013. This related to allegations made in an anonymous letter that there was an organised plot by Muslim groups to promote in some schools a particular narrow-based ideology (although the DfE did state that the new standards were not linked to the allegations). The Commissioner also recognised, however, that the convention of

collective responsibility was engaged with respect to the letter and significant weight should be applied to this principle. While the need for private thinking space in which to deliberate on the timing of the SMSC consultation period and possible implementation of the policy was no longer required, the Commissioner did attach some weight to the wider 'safe space' and 'chilling effect' arguments advanced by the DfE. On balance, the Commissioner concluded that the public interest favoured maintaining the exemption.

23. The wider importance of education in society cannot be over-stated. Any policies or systems that aim to maintain or enhance high quality education will therefore be of interest to the public. The revisions of the ISS are significant because inspections of independent schools, and some academies and Free schools, will be tested against the standards. Ideally then, any proposed changes should be properly tested and consulted upon. In most cases, the substance and development of policy decisions will attract a greater degree of scrutiny than the way in which the policy proposals are administered and finally implemented. The interest in the administration of a policy will increase though where, say, the normal process for consultation is not followed as this could point to weaknesses in the means by which a policy decision was reached. In the view of the Commissioner, there remains a considerable public interest in the requested information.

24. In FS50566201 the Commissioner identified that this public interest was outweighed by what he considered were entirely valid concerns about ensuring that decisions were based on free and frank deliberations. The matter to be decided by the Commissioner in this case is whether the circumstances have changed sufficiently since the previous requests were made to sway the balance of the public interest towards disclosure. In assessing where the balance of the public interest lies, it has been necessary for the Commissioner to return to the principle of collective responsibility.

25. In his guidance on section 35 of FOIA[2], the Commissioner says the following with respect to collective responsibility:

> *209. Collective responsibility is the longstanding convention that all ministers are bound by the decisions of the Cabinet and carry joint responsibility for all government policy and decisions. It is a central feature of our constitutional system of government.*

[2] https://ico.org.uk/media/for-organisations/documents/1200/government-policy-foi-section-35-guidance.pdf

> *Ministers may express their own views freely and frankly in Cabinet and committees and in private, but one a decision is made they are all bound to uphold and promote that agreed position to Parliament and the public.* […]
>
> *210. The convention of collective responsibility incorporates elements of safe space and chilling effect already considered above. However, there is an additional unique element that will carry additional weight: that ministers need to present a united front in defending and promoting agreed positions. If disclosure would undermine this united front by revealing details of diverging views, this would undermine ongoing government unity and effectiveness.*
>
> *211. If collective responsibility arguments are relevant, they will always carry significant weight in the public interest test because of the fundamental importance of the general constitutional principle.*
>
> *212. This weight may be reduced **to some extent** if the individuals concerned are no longer politically active, if published memoirs or other public statements have already undermined confidentiality on the particular issue in question, or if there has been a significant passage of time.* […]
>
> *213. Whether or not the issue is still 'live' will not reduce the public interest in maintaining collective responsibility (although it will affect the weight of related safe space arguments). This is because the need to defend an agreed position will, by its very nature, continue to be relevant after a decision has been taken, and because of the constitutional importance of maintaining the general principle of collective responsibility for the sake of government unity.*

26. Two points salient to the present case emerge from the guidance. Firstly, the importance of the convention of collective responsibility. Secondly, the public interest in collective responsibility continues to carry weight even after the policy decision-making process has concluded. The Commissioner accepts the importance of ministers being able to be frank and candid with one another, the risk that any inhibition could have on the quality of debate and the importance of a collective approach to government decision making.

27. It is clear that any decision to disclose information covered by section 35(1)(b) of FOIA should not be taken lightly. That the exemption is not absolute but is qualified by the public interest test also means, however, that it is necessary to return to the withheld information itself and

consider the nature and severity of the harm that would occur through disclosure.

28. In the view of the Commissioner, the general risk of weakening the principle of collective responsibility, and of undermining a united front, is not increased when the information in this case is taken into account. The general risk of inhibiting ministerial discussions in future debates would not be increased by the specific content of the information. With regard to the timing of the request and the sensitivity of the information, the Commissioner has also found important the fact that, while Lord Nash remains in his position as Parliamentary Under Secretary of State for Schools, the recipients of the letter are no longer in government, a general election took place and a new government was in place by the date of the request. In effect therefore, a fundamental change in the decision-making mechanism had occurred in the interval between the date of the letter and the date of the request.

29. In summary then, while the Commissioner gives weight to the wider public interest in preserving the principle of collective responsibility, the actual risk of harm to the convention is at the lower end of the scale. Against this is the relatively strong public interest in disclosure. The Commissioner considers that the information itself is fairly routine in content. He is of the view though that it does give the public some insight into how decisions regarding the consultation process on an education policy developed. Given the wider context mentioned in paragraphs 22 and 23, the Commissioner considers that disclosure would be of value to the public.

30. Comparing the nature and severity of the prejudicial effects of disclosure against the benefits of transparency, the Commissioner has concluded that in all the circumstances the public interest in favour of disclosure now outweighs the public interest in disclosure. In making this finding, the Commissioner has remained attentive to the importance of the principle of collective responsibility.

Section 36 – prejudice to the effective conduct of public affairs

Request 1(b) – timetable for Lord Nash

Request 1(c) – submission document provided to Lord Nash

31. The DfE considers that sections 36(2)(b)(i), 36(2)(b)(ii) and 36(2)(c) of FOIA apply to the information requested at 1(b) and 1(c). These exemptions state that information is exempt information if, in the reasonable opinion of a qualified person, disclosure under the legislation:

> (b) would, or would be likely to, inhibit –

(i) the free and frank provision of advice, or

(ii) the free and frank exchange of views for the purposes of deliberation, or

(c) would otherwise prejudice, or would be likely otherwise to prejudice, the effective conduct of public affairs.

32. Unlike other exemptions in FOIA, the application of any limb of section 36(2) requires a public authority to consult a relevant qualified person about the request. It further necessitates that the qualified person had the reasonable opinion that the harm referenced in the exemption would, or would be likely to, arise though disclosure. It follows from this that the Commissioner must not only be satisfied that a qualified person gave an opinion but also that the opinion was reasonable in the circumstances.

33. The DfE has confirmed that the same minister – Minister Gyimah – consulted on the requests considered in FS50566201 was also consulted in the present case. The DfE clarified that the Minister gave his opinion that the exemptions in section 36(2) of FOIA were engaged and has provided the Commissioner with copies of the submissions put before him. The Commissioner is satisfied that the DfE consulted with a qualified person as defined by section 36(5) of FOIA and furthermore accepts that the qualified person had agreed with the application of the exemptions. The next step for the Commissioner is therefore to consider whether the qualified person's opinion was reasonable in respect of the application of sections 36(2)(b) and (c).

34. With regard to sections 36(2)(b)(i) and (ii), it is understood that it is the process which may be inhibited rather than what is necessarily contained within the requested information itself. The vital question is whether disclosure could inhibit the process of providing advice or exchanging views in the future. Section 36(2)(c), on the other hand, refers to the prejudice that may *otherwise* occur through the release of the requested information. If section 36(2)(c) is used in conjunction with any other exemption in section 36(2), the prejudice envisaged must be different to that covered by the other exemption. In previous cases the Information Tribunal has found that the exemption may potentially apply to circumstances where disclosure could disrupt a public authority's ability to offer an effective public service.

35. When deciding on the reasonableness of the qualified person's opinion, the test to be applied is whether the opinion is one that a reasonable person *could* hold and not whether it is the *most* reasonable opinion. This will nevertheless require that the opinion not only corresponds with

the factors described in the exemption but also corresponds with the withheld information itself.

36. The qualified person in this case has effectively subscribed to the advice given in the submissions paper put before him. This summarised the background to the requests, explained the operation of the exemptions, and recommended that the Minister find the requested material was still covered by section 36 of FOIA.

37. In FS50566201 the Commissioner had concluded the qualified person's opinion that disclosure would be likely to prejudice those processes specified in sections 36(2)(b)(i) and (ii) was reasonable. On this basis, he found that the exemptions were engaged. The qualified person essentially reproduces this same opinion in the current case. In the view of the Commissioner, it follows that the same finding will only not apply in this case if it is evident that the passage of time between the requests means the opinion can no longer be considered one that a reasonable person could hold. The Commissioner does not consider this to be the case and has therefore accepted that the exemptions do apply.

38. This finding does not extend to the application of section 36(2)(c) of FOIA, however. It is noted that the exemption is cited in the submissions presented to the qualified person. The submissions do not though make a distinction between the prejudice described by the exemptions in section 36(2)(b) and the exemption in section 36(2)(c) which speaks of the prejudice that might *otherwise* arise. This is important because the exemption was not cited, and therefore not considered, in FS50566201.

39. Insofar as the qualified person has not therefore given an opinion on the exemption, the Commissioner has decided that that section 36(2)(c) is not engaged. He has therefore only considered the public interest test in relation to sections 36(2)(b)(i) and (ii) of FOIA. The Commissioner has exercised separately the public interest test against the individual documents referred to in request 1(b) and request 1(c). For the purposes of this notice though, the Commissioner has found it appropriate to set out his public interest findings for both requests under the same heading.

The balance of the public interest test

40. In order to make a determination on where the balance of the public interest lies, the Commissioner must give weight to the qualified person's opinion. As acknowledged in his earlier decision on FS50566201, however, it is for the Commissioner to form his own view on the extent, severity and frequency of the inhibitions claimed may

occur through disclosure and the competing weight of the public interest arguments supporting the release of the requested information.

41. In the circumstances as they were presented on FS50566201, the Commissioner found the following significant:

> *47. At the time of the request, the consultation had already been launched. The Commissioner is therefore of the view that much of the deliberations discussed in these documents had already been decided and acted upon by the time the complainant's request was made. The need for private thinking space and the space to deliberate further on launching the consultation exercise was therefore no longer required by this time. However, as above, the Commissioner accepts that the information relates to a broader live and ongoing process and disclosure could make these ongoing processes harder to manage.*
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> *48. The Commissioner considers that in general terms senior Civil Servants would not be easily deterred from discussing policy options freely and frankly in the future and would be willing to offer their honest advice on the options available despite the potential for future disclosure. The Commissioner considers the FOIA has been in place for some time now and the purpose of such legislation is to promote an open and transparent government. Senior officials should expect that once decisions are made they will be open to public scrutiny.*
>
> *49. The Commissioner notes that the DfE considers there would be a chilling effect on future decision making. Whilst the Commissioner does not accept that any inhibition to future decision making would be as severe or as frequent as the DfE has claimed he does give some weight to the chilling effect argument given the nature of advice provided, the timing of the request, and the sensitivity of the issues.*

42. The DfE acknowledged, and continues to acknowledge, the general public interest in the deeper workings of Government and recognises that openness and transparency assists the public in their overall understanding. It also asserts, however, that good government depends on good decision making and this has to be based on the best available advice and a full consideration of the options. Without protection for thinking space, there is likely to be a corrosive effect on the conduct of good government. In the view of the DfE, the passage of time has not materially affected the likelihood and severity of prejudice to the ability to provide Ministers with the best possible and most candid advice on sensitive and time critical issues.

43. In FS50566201 the Commissioner recognised that there were significant arguments on both sides. As indicated by paragraph 49 of the decision, however, the Commissioner considered that some of the inhibitive effects cited were over-stated or in other cases rejected the arguments of the DfE. For example, the Commissioner said at paragraph 50 that he was sceptical the DfE would be 'held up to ridicule' or challenged if such information was disclosed. Ultimately, though, the Commissioner found that the timing of the request was critical in finding that the public interest favoured maintaining the exemptions in section 36. This was because it was made while the wider policy process was ongoing and was relatively close to when the decision about timing was made. This, in turn, would have impacted on the wider safe space needed for ongoing work and made a chilling effect more likely.

44. The strength of the concerns relating to the smooth-running of the wider policy process would invariably have abated by the date of the request under consideration. This is because the revised standards had come into force on 5 January 2015. By contrast, the Commissioner considers that the weight of the public interest in knowing how an education policy had been administered remained or, at least, had not diminished significantly. The question for the Commissioner is therefore whether the chilling effect connected to disclosure was such that the public interest continued to favour maintaining the exemption.

45. In considering this question, the Commissioner acknowledges that the correlation between the timing of a request and the severity of any chilling effect will not be uniform but will be dependent on the contents of the withheld information and the situation in which the request was made. In *DfE v Information Commissioner* (EA/2014/0079, 28 January 2015)[3], for example, the Information Rights Tribunal considered the DfE's refusal to release the options and advice given to the Secretary of State about the termination of part of the Building Schools for the Future Programme. In that case, the policy-making process was also complete. Yet, the Tribunal found in the context of section 35(1) that this did not automatically remove all the weight from the public interest in favour of withholding information. The Tribunal said that:

> *54. Whilst we agree with the Commissioner that openness as to the substance, the factual basis for the reasons for a decision are important, transparency as to the internal procedure by which the decision is reached would tend to disclose civil service advice*

[3] http://www.informationtribunal.gov.uk/DBFiles/Decision/i1474/020%20280115%20Decision%20EA-2014-0079.pdf

> *possibly placing tensions between Ministers and civil servants and perhaps bringing them into party political arguments.*
>
> […]
>
> *58. From the evidence in this case it is clear that the consultation process adopted has been very largely disclosed. What has not been disclosed is the various options that had been considered by the Secretary of State and the advice given in relation to the options. This is what the DfE consider is worthy of the safe space needed by the Secretary of State. The Commissioner considers disclosure of the Disputed Information would cause little harm because the policy was complete by the time of the Request, and that one of the purposes of disclosure would be to enable the public to check that Ministers were well briefed – the value of the public being able to see how decisions are made in contentious areas.*

46. The Tribunal went on to say later in the notice:

> *We have taken into account that the consultation process had been completed by the time of the Request and although this lessens the need for a safe space for the Government's decision in this case it does not necessarily lessen the chilling effect on future government conduct as explained by Mr McCully in his detailed evidence.*

47. The circumstances of the request considered by the Tribunal and the circumstances of the request considered in the present case do differ. What emerges from the Tribunal's findings though, albeit in relation to the application of section 35 of FOIA, is that the completion of a policy phase does not inevitably mark the end of the need for confidentiality. That being said, chilling effect arguments will normally be at their strongest where they can be linked to the requested information and comparatively weaker the further they travel from the information towards a wider chilling effect. This point is expressed by the Commissioner in his guidance on section 36 of FOIA[4]:

> *49. Chilling effect arguments operate at various levels. If the issue in question is still live, arguments about a chilling effect on*

[4] https://ico.org.uk/media/for-organisations/documents/1175/section_36_prejudice_to_effective_conduct_of_public_affairs.pdf

those ongoing discussions are likely to be most convincing. Arguments about the effect on closely related live issues may also be relevant. However, once the decision in question is finalised, chilling effect arguments become more and more speculative as time passes. It will be more difficult to make reasonable arguments about a generalised chilling effect on all future discussions.

50. Whether it is reasonable to think that a chilling effect would occur will depend on the circumstances of each case, including the timing of the request, whether the issue is still live, and the content and sensitivity of the information in question.

48. In finding that the exemptions in section 36(2) are engaged, the Commissioner has accepted that disclosure would be likely to have a harmful effect to some degree. The Commissioner further acknowledges that there is some merit in the DfE's argument that sound decision-making means officials, and indeed Ministers, being comfortable that deliberation can be based on free and frank advice and not being fearful that historic options papers will be held against the choices made.

49. The Commissioner though considers that the situation has changed since the earlier versions of the requests were made on 11 August 2014. On this analysis, he has found the DfE's chilling effect arguments have been significantly weakened as a result of the completion of the policy-making process and the passage of time. These factors have been critical in the Commissioner's exercising of the public interest test and have led him to conclude that, in all the circumstances, the public interest favours disclosure.

Right of appeal

50. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

    First-tier Tribunal (Information Rights)
    GRC & GRP Tribunals,
    PO Box 9300,
    LEICESTER,
    LE1 8DJ

    Tel: 0300 1234504
    Fax: 0870 739 5836
    Email: GRC@hmcts.gsi.gov.uk
    Website: www.justice.gov.uk/tribunals/general-regulatory-chamber

51. 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.

52. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed .....

Steve Wood
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