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Freedom of Information Podcast

Episode 25 – March 2011

Ladies and gentlemen welcome to episode 25 of the UK's only Freedom of Information podcast. I'm Ibrahim Hasan.

In this episode we look at the changes to the FOI Act, which will be implemented through the Protection of Freedoms Bill as well as the latest FOI decisions (from December 2010 to February 2011). We will focus on:

- The proposal to require datasets to be published and made available for re use
- The new definition of publically owned company
- The Draft Local Government Transparency Code
- The First ICO Undertaking under FOI
- Redaction costs under the Fees Regulations
- Disclosure of information about employees including names, bonus payments, compromise agreements and retirement packages
- AND disclosure of contract incentives

FOI Changes

On 7th January 2011, the Ministry of Justice announced plans to change the FOI regime in a number of ways. We discussed these in detail in episode 24. Work has now started on implementing them:

FOI To Be Extended

We now know that the previous Labour Government's proposals, announced last year, to extend FOI to three bodies (namely the Association of Chief Police Officers, UCAS and the Financial Ombudsman Service) is going to be implemented by the Coalition Government.

On 28th February 2011, in response to a question from Green MP Caroline Lucas, the Justice Minister Nick Herbert confirmed that an order would be placed before Parliament in the spring to implement this extension of FOI to ACPO. He said the order would come into force as soon as practicable. According to ACPO they are working on an implementation date of October this year. No dates have been announced in respect of the other two bodies mentioned above.

As discussed in the previous podcast, twenty other organisations are being consulted, including the Law Society and Bar Council, with a view to adding them to the FOI regime.

Datasets

The Government also announced in January that FOI would be amended to ensure public authorities proactively release data in a way that allows businesses, non-profit organisations and others to re-use the information for social and commercial purposes. This was not welcome

news for many local authorities who feel that they are inundated with requests from the private sector where they are effectively asked to do research for them or to supply information which is then sold on to other public authorities.

These proposals will be given legislative force through the Protection of Freedoms Bill which is currently going through Parliament. Clause 92 of the Bill will amend section 11 of FOI (means by which communication to be made). At present section 11 allows a requestor to choose the format of the information to be supplied to him. As long as this is reasonably practical the public authority must give effect to his preference.

In future where a request is made for information held by the public authority that is a dataset, or which forms part of a dataset, and the applicant requests that information be communicated in an electronic form, then the public authority must, as far as is reasonably practicable, provide the information to the applicant in an electronic form that is capable of re-use. This is in a machine-readable form using open standards which enables its re-use and manipulation. Thus, in future, authorities will be prevented from turning an Excel spreadsheet into a PDF before releasing it in order to stop recipients conducting their own analysis or re formatting of the data. This has been known to happen especially to requests from commercial companies!

What is a Dataset?

A dataset is a collection of information held in electronic form where all or most of the information meets the criteria set out in the following paragraphs (of the new section 11(5) of FOI):

- It has to have been obtained or recorded by a public authority for the purpose of providing the authority with information in connection with the provision of a service by that authority or the carrying out of any other function of the authority

- The information is factual in nature and (a) is not the product of interpretation or analysis other than calculation, in other words that it is the 'raw' or 'source' data; and (b) provides that it is not an official statistic within the meaning given by the Statistics and Registration Service Act 2007 ("SRSA 2007"). Official statistics have been excluded from the definition of datasets as the production and publication of official statistics is provided for separately in the SRSA 2007.

- The information within the dataset has not been materially altered since it was obtained or recorded. Datasets which have had 'value' added to them or which have been materially altered, for example in the form of analysis, representation or application of other expertise, would not fall within the definition.

Examples of the types of datasets which meet the definition include postcodes and references used to identify properties; spend data and information about job roles in a public authority.

Exceptions – Re Usable Format

There is no absolute duty for datasets to be provided in a re-useable format as it is recognised that, in some instances, there may be practical difficulties in relation to costs and IT to convert the format of the information. New section 11A(1) provides for the four criteria which must be met for the new section to apply:

(a) that a person must have made a request for a dataset

(b) that the dataset requested includes a 'relevant copyright work'

(c) that the public authority is the only owner of the 'relevant copyright work', in other words that it is not jointly owned with another party or that it is not owned in whole or in part by a third party; and

(d) that the public authority is communicating the relevant copyright work to the requester under the FOI, in other words that the dataset requested is not being withheld under one of the exemptions provided for in the FOI.

New section 11A(2) provides that when communicating such a dataset to an applicant, the public authority must make the dataset available for re-use in accordance with the terms of a specified license. The terms of such a licenses will be specified in a new section 45 Code of Practice. It is not know at present whether such licenses will allow public authorities to charge for re use.

Proactive Publication

The Bill also requires public authorities to pro actively publish datasets.

Under new section 19(2A) of FOI (to be insert by the Bill), publication schemes must include a requirement for the public authority to publish any dataset it holds, which is requested by an applicant, and any updated version of a dataset, unless the authority is satisfied that it is not appropriate for the dataset to be so published.

All datasets published in this way will have to be in an electronic form which is capable of re-use and it also requires public authorities to make any relevant copyright work (if the authority is the only owner) available for re-use in accordance with the terms of the specified licence (as above)

Subsection (5) of clause 92 amends section 45 of the FOIA (issue of code of practice) to insert a new requirement for the code of practice to include provision relating to the disclosure by public authorities of datasets held by them. Paragraph (b) sets out the different provisions relating to the re-use and disclosure of datasets that may, in particular, be included in the code. Paragraph (c) amends section 45(3) of the FOIA so as to provide for the possibility of making more than one code of practice under section 45, each of which makes different provision for different public authorities.

These new requirements will no doubt mean more work for public authorities at a time when resources are scarce and staff are being reduced. There will be a new code of practice to get to grips with as well as a new publication scheme to adopt or produce. It will be interesting to see the terms of the "specified license" and to what extent if at all public authorities will be able to make a profit from allowing re use of datasets.

Role of the Commissioner

In January the Government announced changes to the role and powers of the Information Commissioner. Clauses 95 to 97 of the Protection of Freedoms Bill will:

- Remove the requirement that the Commissioner seeks the Secretary of State's consent in relation to the appointment of staff, their pay and pensions etc;
- Limit the Commissioner to a single 5 year term and make the appointment process more transparent, including a greater role for Parliament;
- Introduce specific circumstances under which the Commissioner may be removed from office
- Allow the Commissioner to set charges for certain services independently, and to issue statutory guidance without the sign off of the Secretary of State.

The Information Commissioner has welcomed the proposals contained in the Bill, with the caveat that "we [the ICO] will be examining all of the Bill's provisions closely to be satisfied that they will deliver in practice".

Publically Owned Companies

The definition of a "publicly-owned company" under section 6 FOIA is being amended by the Bill. Section 6(1) will no longer apply only to bodies wholly owned by a FOIA-listed authority, but also to those wholly owned by "the wider public sector". Section 6(2) is adjusted so that it also pivots around the concept of "the wider public sector". The effect of this amendment is that even a publically owned company –owned by more than one public sector organisation will be subject to the Act.

Draft Local Government Code

Following Eric Pickles' muscular debut as Secretary of State for Communities and Local Government, savaging high pay in local government and demanding that all spending above £500 is published, the Government has come forward with more concrete proposals. The 'Code of recommended practice for local authorities on data transparency' is in draft and out for consultation:

http://www.communities.gov.uk/publications/localgovernment/codepracticeladataconsult

The consultation runs until 14 March 2011.

Unlike the Information Commissioner's vague model publication schemes, the code specifies items that the DCLG expects all councils, police and fire authorities and others to publish.

The requirement to publish all items of expenditure over £500 is formalised, with a clear message to businesses and sole traders that they should expect their payments to be put into the public domain. The salaries, job descriptions, responsibilities, budgets and staff numbers of all employees earning above £58200 have to be published, although an opt- out is allowed for the name. Expect a guessing game in the local press for all those who exercise this option. In addition, the code requires the publication of an organisation chart for the organisation, councillors' allowances and expenses, contracts, tenders, various policies and performance information, as well as data on the election process.

The Code includes some interesting back-door revivals of the much- ignored Re-Use Regulations, including the requirement to produce a data inventory that sounds remarkably like the PSI Information Asset Register. More obviously, it requires information to be accessible for re-use - commercial and research reuse should be automatically free. Data should be machine readable wherever possible. The Code expects organisations to publish in raw, timely formats wherever they can.

This Code is not a revolution – in its current form, it's recommended, not required. What is also concerning is that much of these Code's provisions are now enshrined within the new requirement, under the Protection of Freedoms Bill, to publish and make available datasets. Why then the duplication? Is it yet another example of government departments not talking to each other?

Audit Commission Act 1998

In the last episode we discussed section 15 of the Audit Commission Act 1998. This gives a right to "any persons interested" (e.g. local council tax payers) to inspect the accounts of a local authority, as well as other named organisations e.g. the NHS, at the time of the annual audit for a limited period of 20 working days. This right extends to all books, deeds, contracts, bills, vouchers and receipts "relating to" the accounts as well as allowing the taking of copies of all or any part of the accounts and those other documents.

In Veolia ES Nottinghamshire Ltd. v Nottinghamshire County Council and Others, [2010] EWCA Civ 1214 the Court of Appeal agreed with the judge at first instance that the types of documents which could be accessed under the 1998 Act were very wide. However, it held that Section 15(1) had to be read so as to preserve the confidentiality of commercially sensitive

information. In reaching its decision that the documents were protected from disclosure in this case, the Court relied on the provisions of the European Convention of Human Rights (ECHR), in particular the right of both individuals and companies to peaceful enjoyment of their possessions (Article 1 of the first protocol).

In January, the Tribunal has handed down another decision on the issue: Nottinghamshire CC v IC & Veolia & UK Coal Mining Ltd (EA/2010/0142) was concerned with a request for disclosure of particular information contained in a waste management contract between the council and Veolia. The particular information in dispute before the Tribunal was information contained in a schedule to that contract. In essence, the schedule detailed the leasing arrangements under which the council had an option to lease certain land from UKCM. The intention was that, once the leasing option was exercised by the council, Veolia would take a sub-lease of the land and then would build and maintain an incinerator on the land for the purposes of discharging its waste management obligations under the contract.

Contrary to the position adopted by the Commissioner, the Tribunal took the view that, despite the fact that it formed part of an overarching waste management contract, the information in the schedule did not in itself amount to environmental information (i.e. as it was simply information relating to prospective commercial leasing arrangements); accordingly, disclosure of the disputed information fell to be considered under FOIA rather than EIR. The applicable FOIA exemption was the commercial interests exemption (section 43).

The Tribunal went on in its decision to comment on the application of human rights principles to the appeal, those principles having been considered by the Court of Appeal in the *Veolia* case. In essence, the Tribunal appears to have held that: (a) following *Veolia*, valuable commercial information could constitute a 'possession' of UKCM under Article 1 of Protocol 1 ECHR; (b) that, if the disputed information amounted to a 'possession', then UKMC had a right to privacy in respect of that information under Article 8(1) ECHR and, accordingly (c) disclosure under FOIA of that information would only be lawful if it was justified for the purposes of Article 8(2) ECHR. However, having reached these conclusions, the Tribunal appears to have taken the view that in fact these human rights considerations did not add very much to the overall analysis under FOIA, particularly as the requirements of the Article 8(2) justification test were already effectively reflected in the public interest balancing exercise which was built into s. 2 FOIA (see para. 74 of the decision).

It remains to be seen whether those with an interest in avoiding disclosure of commercially sensitive information will seek to argue in other cases before the tribunal that human rights considerations do in fact alter the analysis of the public interest balance under FOIA and, in particular, that they increase the weight in favour of maintaining the s. 43 exemption.

First FOI Undertaking

For the first time the Information Commissioner has required an organisation to sign an undertaking for the purposes of improving its freedom of information practices. Until now, the ICO has only required undertakings from organisations for data protection breaches.

In December the University of East Anglia (UEA) signed a commitment to further improve the way it responds to freedom of information (FOI) requests. The action follows the disclosure of emails from the University's Climatic Research Unit in November 2009 which showed an apparent reluctance to respond to valid requests for information about the Unit's involvement in ongoing climate research.

The Vice-Chancellor of the University has now signed a formal undertaking to ensure that staff receive adequate training on the requirements of the FOI Act. The University has also committed to a review of its present systems for the archive, storage and retrieval of emails with emphasis on reducing the prevalence of localised procedures.

A full copy of the undertaking can be viewed on the ICO website: http://www.ico.gov.uk/what_we_cover/promoting_openness/taking_actio n.aspx#Undertakings

Section 12 – Cost of Redaction

Section 12 of the Act and Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (SI 2004 No 3244) (the "Regulations") mean that when a public authority wishes to refuse a request on grounds that to comply with it would be over the appropriate limit, it can only take account of the costs in doing four things calculated at a rate of £25 per hour:

(a) determining whether it holds the information,
(b) locating the information, or a document which may contain the information,
(c) retrieving the information, or a document which may contain the information, and
(d) extracting the information from a document containing it.

On 21 January 2011, the High Court held in Chief Constable of South Yorkshire Police v Information Commissioner [2011] EWHC 44 (Admin), that when estimating the costs of complying with a request for information made under the Freedom of Information Act 2000, a public authority cannot consider time spent redacting exempt information from relevant documents. This is in line with previous decisions (discussed in episode 23)

Section 40 (2) – Third Party Personal Data

Section 40 provides an exemption from disclosure of personal data about the requestor as well as that of third parties. With regards to the latter the public authority must show that

disclosure would breach of one of the data protection principles (usually the First Principle).

In the past few months information about senior public sector employees, especially when leaving employment, has come under the FOI spotlight.

Compromise Agreements

The recent Tribunal decision in Bousfield v Information Commissioner and Liverpools Women's NHS Trust (11th October 2010 EA/2009/0113) concerned the refusal of a request for compromise agreements the Trust had entered with doctors that had "been paid off or 'taken voluntary early retirement". The Tribunal upheld the Trusts refusal (and the Commissioner's Decision Notice) on grounds of it being personal data - Section 40(2).

However there is no hard and fast rule about disclosing information about former senior employees; whether in the form of compromise agreements or voluntary redundancies. The key question is would disclosure be fair to the data subject? The answer depends on many factors including the circumstances surrounding the individual's departure:

In February , the Tribunal (in *Gibson v IC and Craven District Council* (EA/2010/0095) ordered disclosure of information in a compromise agreement with the former chief executive insofar as it related to the use of public funds i.e. the precise financial settlement. The remainder of the information, more personal information from personnel files, could be withheld on the basis of the section 40 exemption (e.g. tax codes and pensions contributions).

The Tribunal found that all information in the requested compromise agreement was personal data. It agreed that generally information on compromise agreements should not be disclosed – but, as ever, context is important. Here the case concerned a very senior employee (the chief executive) who left office with the Council finances "in disarray", but the auditor had – ultimately – approved the settlement paid under the compromise agreement.

As to the lawfulness of disclosure, it observed that this term is not defined in the DPA, but "seems to mean that information may not be processed when the law does not allow it, as opposed to when two parties have entered into a voluntary agreement not to disclose the information". In other words, a mere contractual agreement as to confidentiality does not suffice to render disclosure "unlawful".

As to the fairness of disclosure, the Tribunal distinguished between information on the use of public funds and other information. It noted that compromise agreements are "personnel matters", generally attracting a strong expectation of privacy. Although "personnel" information comes into existence as part of the employee's professional (rather than personal) activities, some of it (such as pension contributions and tax arrangements) are "nevertheless inherently private and would attract a very strong expectation of privacy and protection from the public gaze".

Again, expectations of confidentiality were not decisive on the question of fairness: the Tribunal did "not regard it as reasonable for the ex-CEO (or the council) to expect that certain information relating to the use of public funds, to be hidden from public gaze by virtue of a confidentiality clause agreed between them". Nor was the Tribunal impressed by submissions that disclosure would have a substantial adverse impact on the ex-Coe's employment prospects or personal life.

Ultimately, fairness and condition 6 from Schedule 2 DPA were determined in similar terms: the Tribunal found that "the legitimate interests of members of the public [in transparency] outweigh the prejudice to the rights, freedoms or legitimate interests of the ex-CEO only to the extent that the information concerns the use of public funds".

This provides an illuminating contrast with other s. 40 FOIA cases about compromise or severance agreements. (See Rob Waugh v IC and Doncaster College (EA/2008/0038))(Episode 16) where a journalist wanted information on the investigation into the former principal including the reports drawn up during the enquiry.

The Tribunal gave weight to the existence of an agreement between the college and Mr Gates which included a provision at Clause 15 that expressly limited the amount of information that would be made available to the public about the termination of his employment. It felt that even in the public sector, compromise agreements may be expected to be accorded a degree of privacy as long as there was no evidence of wrongdoing or criminal activity present.

Early Retirement Package

The other recent case on the personal data exemption is *Pycroft v IC and Stroud District Council* (EA/2010/0165). The Appellant wanted to know the package that was offered to the Director of Housing when he took early retirement. The context of the request was an auditor's report which observed that the councils former Director "did not ensure that staff had taken ownership of managing the budgets" and there was an overspend on the Housing Revenue Account for which he was ultimately responsible.

In considering fairness under section 40(2), the Tribunal noted that the pension package is calculated by reference to the sum of past service and not performance. It is just not a snapshot in time of a person's financial situation, disclosure of which would be more likely to be fair especially if the person has just ceased employment in the public sector and so has benefitted from public money. Disclosure of a retirement package today would (if e.g. index linked) enable that person's income to be calculated for the rest of their life, long after they had ceased to be accountable to the public.

The Tribunal agreed with the Commissioner that disclosure of this information would not be fair, The disputed information goes beyond information directly concerning the individual's public role or decision making process and relates to personal finances. Although it is related to the individual's employment (in the sense that it is payment for service), it is not information so

directly connected with their public role that its disclosure would automatically be fair.

The Tribunal also observed that in light of the Strategic Director's seniority and the problems with the HRA overspend this would have been a high profile retirement and that sufficient information was already in the public domain to enable the propriety and timing of such a retirement to be debated in any event without disclosure of the terms.

This decision should be noted by those dealing with requests for information about retirement packages to allegedly poorly performing public sector employees. It shows that just because they have received public money, does not mean disclosure of their information is automatically fair.

Bonus Information

The Information Commissioner's guidance on disclosure of employees' salaries states that public authorities need only disclose salary information within a £5,000 band unless any of the following exceptional circumstances arise.

These are where:

- there are current controversies or credible allegations;
- there is a lack of safeguards against corruption;
- normal procedures have not been followed;
- the individual in question is paid significantly more than the usual salary for their post; or,
- the individual or individuals concerned have significant control over setting their own or other's salaries.

http://www.ico.gov.uk/upload/documents/library/freedom_of_information/practical_application/salaries_v1.pdf

But what of bonus payments made to public sector employees.

The Tribunal decision in *Davis v IC and Olympic Delivery Authority* (EA/2010/0024) concerned a request for bonus payments, performance targets and the targets levels achieved in relation to senior staff at the ODA. In coming to its decision, the Tribunal distinguished between bonus information and performance assessment information.

It ordered disclosure of certain information relating to the bonuses of senior employees of the ODA: the maximum performance-related bonuses to which the chief executive and communications director were contractually entitled, and the percentage of the maximum available bonus actually paid to certain other members of senior management.

The Tribunal did not think that disclosure of this information involves an unwarranted interference with their rights and freedoms. It noted that a certain amount of information about the comparative success against targets may be gleaned from the information that has

already been published and it believe that those taking on such high profile and well remunerated positions on a project of such justified public interest should expect greater than normal publicity about their role and pay. The individual executives in this case may be expected to have been aware of the general trend of openness and transparency in the public sector and of its likely impact on the positions they have attained.

The Tribunal decided, however, that details of the performance targets which individuals failed to hit to 100% satisfaction should not be disclosed. It said that in each case disclosure would involve an intrusion into an element of the individuals' lives which, while work-related, has such a direct impact on career progression and personal self-esteem that it would only be warranted if, in addition to the matters of public interest identified, the operation of the remuneration scheme justified significant criticism.

Names of Staff

There have been a number of Tribunal decisions about disclosure of names of staff. See the Ministry of Defence v Information Commissioner and Rob Evans (see episode 8) which concerns names of civil servants and The Department for Business, Enterprise and Regulatory Reform v Information Commissioner and Friend of the Earth (episode 12) which looked at names of private sector employee.

In January 2011, disclosure of personal data in a civil service context was considered again by the Tribunal. In *Dun v IC and National Audit Office* (EA/2010/0060) the disputed information concerned the NAO's enquiry into the FCO's handling of employee grievances of a whistleblowing variety. It was argued that the section 40(2) exemption applied because disclosure would be unfair due on the expectations of the complainants that their personal data would not be disclosed, and on the distress of their potentially being perceived as "trouble makers".

The Tribunal ruled that junior civil servants' names should not be disclosed as well contact details (except for that part of an email address containing the name of a person whose name was otherwise to be disclosed). Junior civil servants' roles or job titles should be disclosed and details of complaints and criticisms of employees should only be disclosed in sufficiently redacted form).

The issue of redaction turned on whether disclosure in redacted form would preserve anonymity or achieve fairness. The Tribunal found that disclosure of whistleblowing case information in redacted form would be fair where (i) only those involved would be able to identify the persons being referred to, and (ii) those involved would not learn anything from the disclosed material which they did not know already.

This case is another instance of the established position that disclosure of the names of senior civil servants (here Grade 5 or above) will generally be fair, whereas those of their more junior colleagues would not. The Tribunal was clear that no blanket policy should apply, and that

fairness depends on the particular responsibilities and information with which the case is concerned.

Where there is a risk to staff safety if there names are disclosed, then the public authority will be right to err on the side of caution.

In Wild v IC and Chief Constable of Hampshire Constabulary (EA/2010/0132) the Appellant requested from the Chief Constable dates of pre-hunt meetings in the last five years and the names of police officers attending pre-hunt meetings with organizers of the Isle of Wight Hunt. The Police responded, providing dates, but refusing to disclose the names of the officers in attendance.

The Commissioner considered the section 40(2) exemption as clearly the names were third party personal data. He concluded that the disclosure would result in a breach of the first Data Protection principle that data should be processed fairly and lawfully. He accepted that the disclosure may lead to the harassment of the officers identified and consequently the disclosure would be unfair to those officers. The Tribunal upheld the Commissioner's decision.

Section 43 – Contract Incentives

Unlike the early years of FOI, request for commercial information these days are for much more than copies of contracts or tenders. Correspondence, evaluation forms and drafts have all been required to be disclosed.

The Commissioner applies a three tier test to ascertain whether the section 43 exemption (commercial interests) is engaged:

1. Are the interests which will be prejudiced commercial?
2. What is the nature of the prejudice in question?
3. What is the likelihood of the prejudice occurring?

Even if the exemption is engaged, the public interests test has to be applied.

In December 2010, the Commissioner ordered the disclosure of information relating to TV licensing contracts between the British Broadcasting Corporation (BBC) and Capita Business Services Ltd (Capita). (BBC 7/12/10 Ref: FS50228493). The ruling follows a freedom of information request received by the BBC which asked for details of any incentives offered by the corporation as part of their contract with Capita over a three year period.

The BBC originally rejected the request believing that the release of the information would prejudice the commercial interests of the corporation and its contractors. Whilst agreeing that it was entitled to apply this exemption, the Commissioner has decided that it is in the public's interest for the information to be released and has now ordered full disclosure. It said the

corporation must be open to public scrutiny in order to show the many people who regularly watch their programmes, listen to
their radio stations and use their website that they continue to provide value for money.

In reaching its conclusion it the Commissioner noted that the OGC guidance (OGC (Civil Procurement) Policy and Guidance version 1.1,) and the DCA working assumptions note accompanying it sets out twelve areas within a contract which the guidance indicated should normally be disclosed by a public authority in the public interest because it would further the public's understanding of how services bought with public funds would be delivered and how contracts should run. This includes incentive mechanisms.

The End

That concludes episode 25 of the FOI podcast. The next podcast will be in June 2011. Before then you can always catch up on the latest developments in information as well as surveillance law by attending one of my FOI update workshops or downloading my free web seminars. Both carry CPD credits. More details at www.actnow.org.uk

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Thank you for listening. Until the next time – Goodbye.

FOI DECISION UPDATE WORKSHOP BY IBRAHIM HASAN