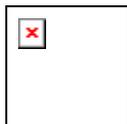


**PUBLIC ACCESS TO OFFICIAL INFORMATION:  
ANNUAL REPORT FOR 2000**

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**Presented to the States on 15th May 2001  
by the House Committee**

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**STATES OF JERSEY**

**STATES GREFFE**

150

2001

R.C.19

Price code: C

## **Foreword**

The House Committee takes pleasure in presenting the first report on the operation of the Code of Practice on Public Access to Official Information.

The Code was approved by the States on the 20th July 1999 and came into force on the 20th January 2000.

The greatest impact of the Code in its first year has been on the preparation of Committee Meeting Agenda and Minutes and making Part A of these available. Some Committees had already taken this initiative before the introduction of the Code and were joined by the remainder after the 20th January 2000.

The House Committee whilst pleased with the result is aware that some Committees have not opened all that which could be available on the Agenda and subsequently in the Minutes. The Committee urges Presidents to take care when preparing Agenda items to make sure that every effort is made to be as open as possible.

The report reflects the statistics of the working of the Code but the natural move from the Code is to introduce legislation. During the second year of working with the Code a closer scrutiny will be taken by the House Committee with the intention of placing a more political analysis before the States.

## REPORT

### Introduction

This is the first annual report of the House Committee on the operation of the Code of Practice on Public Access to Official Information, which was approved by the States on 20th July 1999, and came into force on 20th January 2000. (Copy attached at Appendix A.) This report provides an assessment of the actual implementation of the Code which sets a minimum standard of openness, which may, of course, be exceeded, and in accordance with the States' decision, the Committee is charged to review the political position to consider whether legislation should be introduced.

The Code constitutes a States' policy, and affects the States, States Committees and their sub-committees. It does not apply to legal departments, or bodies which are outside the States' main framework, such as the Financial Services Commission, or the Waterfront Enterprise Board. Nor does it include the Parishes as the States have no authority over the Parishes, although all Parish meetings are open to the public and the agendas and minutes are public in their entirety. It is encouraging that certain agencies which do not have to apply the Code, such as the Jersey Police Authority, the Office of the Lieutenant Governor and the Viscount's department have agreed to do so voluntarily.

The Code confers -

- a general right of access to information held by authorities which is (a) not exempt, and (b) created after 20th January 2000;
- a right of access to personal information, that is information about an identifiable individual, subject to exemptions, and while safeguarding an individual's right to privacy. The authority has an obligation to correct any personal information held about an individual that is shown to be incomplete, inaccurate or misleading, except that expressions of opinion given conscientiously and without malice will be unaffected. For personal information, access is retrospective;
- a right of access to Committee and sub-committee agendas and minutes, where these do not contain confidential information, but not to agenda support papers.

The Code established a *minimum* standard of openness and accountability by the States of Jersey, which may, by its very nature, be exceeded.

### Preparation for the introduction of the Code

The House Committee appointed an Access to Information officer on a part time basis for a period of six months from 15th November 1999 to assist it in developing guidelines and procedures to ensure the successful introduction of the Code of Practice for Public Access to Official Information which came into effect on 20th January 2000. Thereafter the administration and monitoring relating to Access to Information matters on behalf of the House Committee has been carried out by its Committee Clerk.

The preparatory phase involved the Access to Information Officer in discussing with members of the House Committee and senior officers in States departments how best to ensure that minimum standards of openness and accountability are applied to the States, its Committees and departments.

The specific tasks set were as follows -

- to prepare a public information leaflet;
- to publicise the process;
- to advise and assist States departments in planning for providing access to information, and to prepare guidelines to issue to employees;
- to produce a standard application procedure and form;
- to put into place a procedure for monitoring, reviewing and reporting on the Code itself.

Because of the tight time-scales, it was necessary to prioritise the above specific tasks and concentrate on each in order to

ensure successful delivery on time. Accordingly, certain issues such as training for staff in departments had, of necessity, to wait until higher priority tasks had been implemented.

### **Agendas and minutes**

The House Committee decided at an early stage that it would be impossible to be prescriptive as to how the Code should be applied with regard to agendas and minutes as there was a very broad range of services and circumstances, and each Committee was therefore free to determine its own way forward. The Access to Information Officer was available throughout the period to assist departments in reaching their decisions.

The House Committee agreed that agendas would be split into two parts, with publicly available matters being dealt with in Part A and confidential matters in Part B. The first task was to notify all departments of the Committee's decision that the new format would be introduced for agendas and minutes from the commencement of the new States' session on 14th December 1999 to ensure there was not a break, mid-session, in the way minutes were produced. Departments were asked to consider how they wished their agendas to be presented, to be dovetailed with States' Greffe requirements, and to begin to prepare their agendas in this way during the period 14th December 1999 to 19th January 2000 without the open part being made available to the public. A small number of Committees had in fact taken this step already, so that by the introduction of the Code on 20th January they would be fully prepared. Some Committees, like the Tourism Committee and the Public Services Committee, had been making their agendas available to the media for a number of years. All Part A agendas created after 20th January 2000, and all signed Part A minutes created after that date, then entered the public domain.

### **Access to information held by departments**

Guidance Notes for departments and employees were prepared and issued on 2nd December 1999 to advise them of their rôle in meeting the purpose of the Code of establishing a minimum standard of openness and accountability by the States of Jersey, its Committees and departments, through -

- (a) increasing public access to information;
- (b) supplying the reasons for administrative decisions to those affected, except where there is statutory authority to the contrary;
- (c) giving individuals the right of access to personal information held about them and to require the correction of inaccurate or misleading information;

while, at the same time -

- (i) safeguarding an individual's right to privacy; and
- (ii) safeguarding the confidentiality of information classified as exempt under the Code.

There is a presumption of openness in the application of the Code of Practice, but information shall remain confidential if it is classified as exempt. Departments were advised to review carefully the exemptions in Part III of the Code with a view to establishing what could and could not be made available. Departments were advised of their obligations under the Code, which are as follows -

Subject to the exemptions listed in Part III, an authority shall -

- (a) keep a general record of all information that it holds;
- (b) take all reasonable steps to assist applicants in making applications for information;
- (c) acknowledge the receipt of an application for information and endeavour to supply the information requested (unless exempt) within 21 days;
- (d) take all reasonable steps to provide requested information which they hold;
- (e) notify an applicant if the information requested is not known to the authority or, if the information requested is held by another authority, refer the applicant to that other authority;

- (f) make available information free of charge except in the case of a request that is complex or would require extensive searches of records, when a charge reflecting the reasonable costs of providing the information may be made;
- (g) if it refuses to disclose requested information, inform the applicant of its reasons for doing so;
- (h) correct any personal information held about an individual that is shown to be incomplete, inaccurate or misleading, except that expressions of opinion given conscientiously and without malice will be unaffected;
- (i) inform applicants of their rights under this Code;
- (j) not deny the existence of information which is not classified as exempt which it knows to exist;
- (k) undertake the drafting of documents so as to allow maximum disclosure.

Prior to the Code being adopted, there was a concern that considerable resources would be required to meet these obligations. Steps were taken to allay these fears, however departments were reminded that they would need to satisfy themselves, for example, that their indexes were adequate to enable access to information, although it was anticipated that they would be. It was recommended that in the main, there was no need to review all files to establish the status of information they contained, partly because experience elsewhere indicated that there will not be a large uptake in response to the Code, except perhaps in the initial stages, and a review of files would therefore be inappropriate. Therefore, it was recommended that they should only be reviewed as and when a request pertaining to a file was received. It was emphasised that the Code allows access to **information**, not files or documents, and documents or files need not be made available unless it is appropriate and more convenient for the authority to handle the request in this way. Under normal circumstances, a member of staff would carry out the search, and present the information requested, if not exempt, in an appropriate format, subject to such checks and balances as departments put into place.

The Guidance Notes included a full explanation of how to administer applications received from the public, and included draft letters for departmental adaptation and use, a sample standard application form which could be adapted to a department's house style, and a form to complete for six monthly returns to the Information Officer on the number and nature of the enquiries received and any difficulties encountered. These guidelines, forms and a copy of the Code were all placed on the States intranet for ease of use by departments, and the forms are attached at Appendix B for information.

### **Public information leaflets**

A public information leaflet was produced, and translated into Portuguese and French, and these were released mid-January 2000 with a media statement from the President, and were made available from all departments, Post Offices, Libraries and the States' Bookshop.

### **Training and support**

From November to April, there followed a period of supporting officers in putting their procedures into place. Seminars were held in March 2000 for departmental information officers once they had been appointed to give them the full background to the proposals, and an opportunity to discuss individual difficulties. These were well attended and widely welcomed.

Since the end of the secondment period of the Access to Information officer, the work associated with this function has been undertaken by the States Greffe, and from July 2000, the rôle of Access to Information Officer has been subsumed into the work of the House Committee Clerk, supported by the Assistant Greffier of the States.

### **Monitoring**

The procedure for monitoring applications to departments from the public for personal and other information was put in place at the outset on a six monthly basis, and the first returns were received at the end of the first period, 30th June 2000. The number of enquiries received were as follows -

#### **Applications processed during the period - 20th January 2000 to 30th June 2000**

̄NB. Those departments not mentioned made a zero return.

**Department:**

**Employment and Social Security**

|   |                   |
|---|-------------------|
|   | <b>Department</b> |
| No. of applications which mentioned the Code: | 3                 |
| No. of applications refused:                  | 0                 |

Notes: The Contributions Section also dealt with 283 letters requesting information covered by the Data Protection (Jersey) Law 1987 as amended.

|   |  |
|---|--|
| <b>Department:</b>                            | <b>Health and Social Services<br/>Department</b> |
| No. of applications which mentioned the Code: | 17   |
| No. of applications refused:                  | 1 partial exemption                              |

Notes: Applications for personal health/social records. 1 applicant made 3 applications

|   |                           |
|---|---------------------------|
| <b>Department:</b>                            | <b>Housing Department</b> |
| No. of applications which mentioned the Code: | 1                         |
| No. of applications refused:                  | N/A                       |

Notes: Application being processed at the time of the return.

|   |                                   |
|---|-----------------------------------|
| <b>Department:</b>                            | <b>Human Resources Department</b> |
| No. of applications which mentioned the Code: | 1                                 |
| No. of applications refused:                  | 0                                 |

|   |                        |
|---|------------------------|
| <b>Department:</b>                            | <b>Jersey Harbours</b> |
| No. of applications which mentioned the Code: | 2                      |
| No. of applications refused:                  | 0                      |

|   |                                       |
|---|---------------------------------------|
| <b>Department:</b>                            | <b>Planning and Building Services</b> |
| No. of applications which mentioned the Code: | 3                                     |
| No. of applications refused:                  | 2                                     |

Notes: Refusals were made on the basis that the requests referred to policies in the course of development.

|   |                                   |
|---|-----------------------------------|
| <b>Department:</b>                            | <b>Public Services Department</b> |
| No. of applications which mentioned the Code: | 1                                 |
| No. of applications refused:                  | 0                                 |

### Applications processed during the period - 1st July 2000 to 31st December 2000

|   |   |
|---|---|
| <b>Department:</b>                            | <b>Employment &amp; Social Security</b> |
| No. of applications which mentioned the Code: | 2                                       |
| No. of applications refused:                  | 0                                       |

Notes: The Contributions Section also dealt with 356 letters requesting information covered by the Data Protection (Jersey) Law 1987 as amended.

|   |  |
|---|--|
| <b>Department:</b>                            | <b>Health and Social Services<br/>Department</b> |
| No. of applications which mentioned the Code: | 6  |
| No. of applications refused:                  | 3  |

Notes: Applications for personal health/social records. Information is sent to the General Practitioner of requested. 1 applicant made 3 applications.

#### **TOTALS 2000**

|                                     |                     |
|-------------------------------------|---------------------|
| <b>Total number of applications</b> | <b>36</b>           |
| <b>Number of refusals</b>           | <b>5, 1 partial</b> |

Numbers of queries are low, and in some cases people are now coming forward for information which in some cases was already available, but this fact has not been well known. The Employment and Social Security Department in particular advised at the end of the first period that the advent of the Code gave rise to applications for information which was already

available to its clients on request. The only difficulty encountered is that a department already shouldering much of the responsibility for responding to requests for information has now received even more. There may be a case for improving communication with the public, and for departments to re-examine their leaflets to explain more clearly that the public do have access to certain information already. There is a slight concern that occasionally information requested by an individual does not actually serve the purpose for which he is seeking the information (for example a complete contribution record does not guarantee that that person was present in the Island for the whole of the period) and that abortive time is being spent collating such detail.

When the Code was first introduced, it was made clear that monitoring should only relate to the provision of new information enabled by the introduction of the Code. It may be that there is a blurring of lines, and it is true that as time wears on it will be increasingly difficult to distinguish between that information that was releasable prior to the Code, and that information that was enabled by the Code's introduction. It may be that this distinction is already becoming difficult to maintain, and should be dispensed with, or that there has been a significant upturn in the number of requests for which reasons should be found and examined. It is recognised that staff in departments have always tried to be helpful, and have always responded to requests for information wherever possible. Any move to document every request for information in person, orally or by e-mail would hamper this flow, and it may be that by removing the distinction pre- and post- introduction of the Code, the monitoring should capture only applications which have been received in writing, or where reference to the Code was made by staff prior to release.

It was hoped that all applications could be processed free of charge, but scope existed for a charge to be levied where substantial staff time or photocopying charges were raised. There is no evidence that any charge has been made for an application during the period.

### **The next period**

In the light of experience during 2000, the House Committee has decided -

- that in view of the low number of applications, it is not necessary for returns to be submitted twice a year. The monitoring of applications will therefore occur at yearly intervals, the return being submitted in January for the previous year;
- statistics relating to applications should only capture applications which have been made in writing, or applications, however made, where a member of staff has consulted the Code to establish whether information is capable of release;
- to obtain feedback from the public on how the Code has progressed. This would also serve to remind the public of their rights under the Code. The Committee would like to invite members of the public and the media to forward details of their experience of the Code to the House Committee, c/o States Greffe, Morier House, Halkett Place, St. Helier JE1 1DD.

Monitoring of agendas and minutes did not occur in the initial stages as the House Committee had agreed not to be prescriptive with regard to the construction of agendas and minutes. After the Code had been in place for the first six months, the Committee decided that a selection of agendas and minutes should be reviewed to assess how the Code was being applied in these areas. Clearly, every Committee is now preparing agendas in the new format for both Committees and Sub-Committees, and is making these available at convenient points in their receptions, as well as being available at the States' Greffe.

Some disparity has been noted between Committees in the way items are attributed to Part A (public) and Part B (confidential) of their agendas. A matter in Part A of the agenda would normally appear in Part A of the minutes, but there remain options for the transfer of minutes to Part B of the record where the Committee believes this is necessary. If a confidential matter is raised during the course of the discussion on a Part A item, then the option is always there for the minute to be inscribed in Part B of the minutes, with a note in Part A explaining why that transfer has occurred, or for the record to be divided between Part A and Part B of the minutes, in accordance with the obligation of the authority to undertake the drafting of documents so as to allow maximum disclosure. This obligation should also be reflected in the preparation of reports by departments, to facilitate the release of information which is not exempt. While the Code does not require the release of reports which support an agenda item, Committees are not precluded from doing so, save where exemptions apply.

A second area which sometimes causes difficulty is that relating to a policy under the course of development. It is a matter for the individual Committee as to how it makes its developing policy available to the public for consultation, and Committees commonly adopt a procedure for consulting other Committees, members of professional organisations and the public. However, once a policy has been approved and is in the process of being put into place, or has been implemented, it is

arguable whether progress reports on those policies should also be in Part B of the minutes. It would be inappropriate for the exemption relating to the development of a draft policy to be applied, although there may be another legitimate reason for exemption.

The position taken by the Home Affairs Committee is particularly encouraging - this Committee's agendas are virtually all Part A, with a small handful only in Part B. (Often these matters are designated Part B on the Home Affairs Committee agenda because they have been forwarded by another Committee which has already attributed a Part B designation, protocol demanding that the designation of the originating Committee should be maintained.) It is hoped that other Committees, when they review their own experience, will re-evaluate their agendas and see whether they feel they can mirror the stance taken by Home Affairs.

While there is not a big demand from the general public to read Committee minutes which may be found in the States' Bookshop, news stories show that they are being accessed by the media on behalf of the public. In addition, certain Committees, such as the Public Services Committee, have begun loading their minutes onto their website, enabling access in households on the internet, or from the Public Libraries. The States' Greffe is involved with the establishment of the States of Jersey website, and documents prepared in the States' Greffe will be capable of being uploaded onto the website, indeed, the Constitution of the States, States' Order Papers and Minutes, Projets and R.C.s, forming the first phase of the project, will be available by April 2001. Signed Part A minutes of Committees are being dealt with become available as part of the second phase of the project, within a period of six months.

The Committee would like to thank Mrs. Anne Harris for developing the guidelines and procedures and ensuring the successful introduction of the Code, and also the Committees and their respective Information Officers for embracing the principles and putting the procedures into place. The Committee looks forward to Committees extending access to all aspects of their work, and exceeding the minimum requirements set down in the Code.

**A CODE OF PRACTICE ON ACCESS TO INFORMATION  
HELD BY THE STATES, COMMITTEES OF THE  
STATES AND DEPARTMENTS OF THE STATES  
(Adopted by Act of the States dated 20th July 1999)**

**PART I: Description**

**1. Purpose**

1.1 The purpose of this Code is to establish a minimum standard of openness and accountability by the States of Jersey, its Committees and departments, through -

- (a) increasing public access to information;
- (b) supplying the reasons for administrative decisions to those affected, except where there is statutory authority to the contrary;
- (c) giving individuals the right of access to personal information held about them and to require the correction of inaccurate or misleading information,

while, at the same time -

- (i) safeguarding an individual's right to privacy; and
- (ii) safeguarding the confidentiality of information classified as exempt under the Code.

**1.2 Interpretation and scope**

1.2.1 For the purposes of this Code -

- (a) "authority" means the States of Jersey, Committees of the States, their sub-committees, and their departments;
- (b) "information" means any information or official record held by an authority;
- (c) "personal information" means information about an identifiable individual.

**1.2.2 In the application of this Code -**

- (a) there shall be a presumption of openness;
- (b) information shall remain confidential if it is classified as exempt in Part III of this Code;

1.2.3 Nothing contained in this Code shall affect statutory provisions, or the provisions of customary law with respect to confidence.

1.2.4 This Code applies to information created after the date on which the Code is brought into operation and, in the case of personal information, to information created before that date.

**PART II: Operation**

**2. Obligations of an authority**

2.1 Subject to the exemptions listed in paragraph 3, an authority shall -

- (a) keep a general record of all information that it holds;

- (b) take all reasonable steps to assist applicants in making applications for information;
- (c) acknowledge the receipt of an application for information and endeavour to supply the information requested (unless exempt) within 21 days;
- (d) take all reasonable steps to provide requested information that they hold;
- (e) notify an applicant if the information requested is not known to the authority or, if the information requested is held by another authority, refer the applicant to that other authority;
- (f) make available information free of charge except in the case of a request that is complex, or would require extensive searches of records, when a charge reflecting the reasonable costs of providing the information may be made;
- (g) if it refuses to disclose requested information, inform the applicant of its reasons for doing so;
- (h) the authority shall correct any personal information held about an individual that is shown to be incomplete, inaccurate or misleading, except that expressions of opinion given conscientiously and without malice will be unaffected;
- (i) the authority shall inform applicants of their rights under this Code;
- (j) the authority shall not deny the existence of information which is not classified as exempt which it knows to exist;
- (k) the authority shall undertake the drafting of documents so as to allow maximum disclosure.

## **2.2 Responsibilities of an applicant**

The applicant shall -

- (a) apply in writing to the relevant authority having identified himself to the authority's satisfaction;
- (b) identify with reasonable clarity the information that he requires;
- (c) be responsible and reasonable when exercising his rights under this Code.

## **2.3 Appeals**

- 2.3.1 If an applicant is aggrieved by an authority's decision to refuse to disclose requested information or to correct personal information in a record, he will have the right of appeal set out in Part IV of this Code.

# **PART III: Access and exemptions**

## **3.1 Access**

Subject to paragraph 1.2.3 and the exemptions described in paragraph 3.2 -

- (a) an authority shall grant access to all information in its possession, except that Committees of the States, and their sub-committees, shall grant access to the agendas and minutes of their meetings, but not to agenda support papers;
- (b) an authority shall grant -
  - (i) applicants over the age of 18 access to personal information held about them; and
  - (ii) parents or guardians access to personal information held about any of their children under the age of 18.

## **3.2 Exemptions**

Information shall be exempt from disclosure, if -

- (a) such disclosure would, or might be liable to -
  - (i) constitute an unwarranted invasion of the privacy of an individual;
  - (ii) prejudice the administration of justice, including fair trial, and the enforcement or proper administration of the law;
  - (iii) prejudice legal proceedings or the proceedings of any tribunal, public enquiry, Board of Administrative Appeal or other formal investigation;
  - (iv) prejudice the duty of care owed by the Education Committee to a person who is in full-time education;
  - (v) infringe legal professional privilege or lead to the disclosure of legal advice to an authority, or infringe medical confidentiality;
  - (vi) prejudice the prevention, investigation or detection of crime, the apprehension or prosecution of offenders, or the security of any property;
  - (vii) harm the conduct of national or international affairs or the Island's relations with other jurisdictions;
  - (viii) prejudice the defence of the Island or any of the other British Islands or the capability, effectiveness or security of the armed forces of the Crown or any forces co-operating with those forces;
  - (ix) cause damage to the economic interests of the Island;
  - (x) prejudice the financial interests of an authority by giving an unreasonable advantage to a third party in relation to a contract or commercial transaction which the third party is seeking to enter into with the authority;
  - (xi) prejudice the competitive position of a third party, if and so long as its disclosure would, by revealing commercial information supplied by a third party, be likely to cause significant damage to the lawful commercial or professional activities of the third party;
  - (xii) prejudice the competitive position of an authority;
  - (xiii) prejudice employer/employee relationships or the effective conduct of personnel management;
  - (xiv) constitute a premature release of a draft policy which is in the course of development;
  - (xv) cause harm to the physical or mental health, or emotional condition, of the applicant whose information is held for the purposes of health or social care, including child care;
  - (xvi) prejudice the provision of health care or carrying out of social work, including child care, by disclosing the identity of a person (other than a health or social services professional) who has not consented to such disclosure;
  - (xvii) prejudice the proper supervision or regulation of financial services;
  - (xviii) prejudice the consideration of any matter relative to immigration, nationality, consular or entry clearance cases;
- (b) the information concerned was given to the authority concerned in confidence on the understanding that it would be treated by it as confidential, unless the provider of the information agrees to its disclosure; or
- (c) the application is frivolous or vexatious or is made in bad faith.

#### **PART IV: Appeal procedure**

- 4.1 An applicant who is aggrieved by a decision by an officer of a States department under this Code may in the first instance appeal in writing to the President of the Committee concerned.
- 4.2 An applicant who is aggrieved by the decision of an authority under this Code, or by the President of a Committee under paragraph 4.1, may apply for his complaint to be reviewed under the Administrative Decisions (Review) (Jersey) Law 1982, as amended.





**Public Access to Information  
Information - Request Form**

*Please complete in BLOCK CAPITALS*

NAME.....

...

ADDRESS.....

POST CODE..... DAYTIME TELEPHONE NO.....

To help us monitor the effectiveness of the Code of Practice on Public Access to Official Information, please indicate below in what capacity are you making the request –

- Private individual
- Journalist
- Representing charity/lobby group

- Academic
- Business

*Please tick*

**INFORMATION REQUIRED** Please be as specific as you can

|  |
|--|
|  |
|  |
|  |
|  |
|  |
|  |
|  |
|  |
|  |
|  |

*(Continue on a separate sheet if necessary)*

**Proof of Identity**

The authority has a responsibility to safeguard an individual’s right to privacy. If the information you require is personal, please be prepared to show proof of identity, such as a driving licence.

**OFFICIAL USE**

|                                       |  |                             |  |
|---------------------------------------|--|-----------------------------|--|
| first inquiry received                |  | No charge                   |  |
| request form received                 |  | Consultation if charge made |  |
| f of identity seen                    |  | Charge levied               |  |
| of release of information             |  |                             |  |
| ptions applied if application refused |  | Officer name                |  |

# Public Access to Information

## Six monthly return

DEPARTMENT \_\_\_\_\_

Return for the period ending 30th June / 31st December 200\_

NO. OF REQUESTS RECEIVED DURING  
PERIOD WHICH MENTION CODE

NO OF APPLICANTS SUBMITTING MORE THAN ONE REQUEST,  
AND HOW MANY REQUESTS EACH PERSON MADE -

Applicant A \_\_\_\_\_ applications  
Applicant B \_\_\_\_\_ applications

CATEGORY OF APPLICANT, *Please insert numbers*

|                                  |          |
|----------------------------------|----------|
| Private individual               | Academic |
| Journalist                       | Business |
| Representing charity/lobby group |          |

NO. OF REQUESTS FOR  
PERSONAL INFORMATION

NO. OF APPLICATIONS DEALT WITH  
WITHIN 21 DAYS

NO. OF REQUESTS FOR WHICH A CHARGE  
WAS MADE

NO. OF TIMES A REQUEST WAS REFUSED

IF REQUEST REFUSED, EXEMPTIONS MOST COMMONLY  
CITED Most used exemption first: e.g. xvi, xv, xii.  
Insert at least one -

NO. OF APPEALS TO PRESIDENT

Please forward any comments you may wish to make or feedback on the operation of the Code together with this return. Any urgent concerns should be forwarded immediately.

NAME OF REPORTING OFFICER

Contact Telephone Number

*PLEASE RETURN THIS FORM TO THE INFORMATION OFFICER, MORIER HOUSE*