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IMMIGRATION DIRECTORATES' INSTRUCTIONS

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CHAPTER 25 SECTION 6

APPLYING EXEMPTIONS WHERE INFORMATION IS REASONABLY ACCESSIBLE BY OTHER MEANS OR IS INTENDED FOR FUTURE PUBLICATION

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**CHAPTER 25
SECTION 6****APPLYING EXEMPTIONS WHERE INFORMATION IS
REASONABLY ACCESSIBLE BY OTHER MEANS
OR IS INTENDED FOR FUTURE PUBLICATION****1. DEALING WITH REQUESTS WHERE THE INFORMATION IS ALREADY
REASONABLY ACCESSIBLE TO THE APPLICANT BY OTHER MEANS****1.1 Background**

Under section 21 of the Freedom of Information Act (“the Act”) IND does not need to provide any information requested by an applicant if that ***information is reasonably accessible to the applicant by other means***. The purpose of this particular exemption is that if there is another existing route by which information is already available to the public and this is reasonably accessible to an applicant, then the Act places no obligation on the Home Office to disclose that information. However, IND Directorates must always provide a response to an applicant’s information request even where it is apparent that the information concerned has already been published.

The exemption under section 21 is the most straightforward of all of the 23 substantive exemptions contained within the Act. It is an absolute exemption and so does not require staff to carry out a public interest balancing test in order to assess whether or not the information should be disclosed. The following working assumption will help any member of IND staff who deals with requests to consider whether the exemption could apply to a request for information.

Working assumption on section 21: if it is a matter of fact that the information requested from IND by an applicant is in the public domain, then there is no need to disclose this unless the applicant cannot reasonably access it.

While the application of this exemption should not raise too many concerns for staff, there may be some exceptional cases where there is some doubt about whether the information is reasonably accessible to the particular applicant. In these cases, staff may have to consider doing more than simply advising applicants where to obtain the information they want in the public domain. This guidance provides further advice for IND staff on how to assess whether information may be reasonably accessible to the applicant.

IND Directorates should ensure that the exemption is authorised at HEO/CIO level or above before a final response is sent to an applicant. There is no requirement for IND Directorates to approve the use of this exemption with the IND Central FOI Team. But for monitoring purposes staff should still inform the IND Central FOI Team that they have applied this exemption by filling in the template provided at Section 2 of this IDI Chapter **Annex B** entitled: ‘***Notifying outcome of non-routine FOI requests to the IND Central FOI Team***’. This can be faxed or sent by email to the following Poise address on the Home Office global address list: Freedom of Information Team (IND).

1.2 Information already reasonably accessible to an applicant

Most IND Directorates will know whether the information they are responsible for has been placed in the public domain and is reasonably accessible to the public.

Examples of the categories of information that IND regularly publishes and which will usually be covered by this exemption if it is requested include:

- Information made available by IND through the Home Office's [publication scheme](#) which is available either free or on payment of a fee.
- Information which is otherwise already available from the Home Office or IND external websites, or which can be requested from IND either free or on payment of a fee.
- Published information (e.g. White Papers, consultation papers, official reports and legislation) available for a fee from the Stationary Office or their website for free.
- Information provided in Hansard (e.g. parliamentary debates, answers to PQs etc)
- Information available in record offices and public archives
- Information held by IND, which is known to be available from another non-Home Office source.

Where an applicant asks for information which is relatively minor in detail and which IND Directorates regularly provide to applicants (such as application forms) there will be no need to apply this exemption even if the information is published under one of the categories listed above.

Usually the exemption will only need to be applied by IND staff where the request is for relatively large or wide-ranging information which may already be in the public domain but which IND Directorates do not routinely provide copies of to applicants. Staff should apply the exemption in these circumstances and simply tell the applicant where to obtain the information from, unless it is ***not reasonably accessible to the applicant concerned***.

Points 1.3 to 1.6 of this guide have further information for staff on the other considerations they will need to take into account when deciding whether information may be reasonably accessible to the applicant concerned.

1.3 Requests for information where payment is required

In some cases applicants may request information from IND and there could be some doubt as to whether it is reasonably accessible because it is not available free of charge. The Act makes it clear where this is the case that information may be reasonably accessible to the applicant even though there may be a charge.

There are two cases where charges may be made:

- Where there is a specific statutory scheme under which information is provided for a fee.
- Where the information is provided under the Home Office's publication scheme and this indicates that a charge may be made for information falling within a particular class.

There may be some rare occasions where the fact that there is an existing charge for information may, however, mean that it is not reasonably accessible to the applicant.

For instance, IND may be asked by an applicant for information which it has supplied to a report which can be only obtained through the payment of a fee. It may not be reasonable to require the applicant to purchase a copy of the report if the request is only for a small amount of the IND related information contained in it. In these cases IND staff should simply disclose the information requested as it would not normally exceed the £600 cost limit for dealing with requests which is outlined in Section 4 of this IDI Chapter.

1.4 Disclosures required by law

If there is a legal duty to make information available, then it can also be considered by IND staff to be reasonably accessible to the applicant even if it is not described in the Home Office publication scheme.

There is one important exception to this general rule: information which is only available on inspection to an applicant by visiting, for example, the premises of IND. Unless this information falls within a class of information included in the Home Office's publication scheme, it should not be considered as reasonably accessible even though it is disclosed or published under statute.

1.5 Assessing an applicant's ability to access information

On occasion it may not always be sufficient to simply refer applicants to the existence of information which may already be available in the public domain. The test for the application of this exemption is whether the information is reasonably accessible to **the applicant making that request**. If during the course of correspondence or other communication an applicant explains that their own circumstances may affect their ability to access to the information requested, staff should take these into account when handling the particular request. Staff must not, however, specifically ask about an applicant's personal circumstance or make any prior assumptions about an applicant's ability to access information. An assessment of whether an applicant can reasonably access the information concerned must be based on any personal information supplied by that applicant.

While any assessment of whether an applicant can reasonably access information must assess all of the circumstances known in the individual case, the following general considerations should also be taken into account by staff:

Non-English Speakers

The Act does not place a general duty upon IND to translate information which it holds into other languages. However, if it is clear from the request that the applicant would have difficulty in understanding information in English, it may on occasions be reasonable to provide a translation. For instance, if the applicant is a member of a local community for which English is not the first language, it may be reasonable to provide a translation where IND holds information which has already been translated into that language.

The Welsh Language Act 1993 confirms in law that Welsh and English are equal in Wales. Any requests received in the Welsh language should be responded to in Welsh in the interests of good customer service. The translation of text to, and from,

Welsh is not chargeable under the consideration of the £600 cost limit outlined in Section 4 of this IDI Chapter since it fulfils a pre-existing statutory obligation.

Applicants with a disability

If an applicant has a disability and asks for information in another format, for instance in Braille or on audio tape, then consideration should be given to providing information in the form requested. Again, the Act does not place a duty on IND to provide information in Braille or on audio tape although staff should endeavour, where it is reasonable to do so, to communicate information by the applicant's preferred means. For example, where information is already held on audio recordings by IND it may be reasonable and practicable to provide a copy of these to an applicant if they have requested and have stated that they have a disability.

Providing information in non-electronic form

In many cases IND only publishes information on the IND or Home Office website. Where an applicant requests information which is only published on the IND website, staff should provide information in hard-copy format to applicants who make it clear that they have no way of accessing the Internet. This is on the basis that the information may not be reasonably accessible to the applicant concerned and so the exemption here would not apply. Where the cost of supplying such information to the applicant in this form would exceed the cost limit of £600 (see section 4 of this IDI Chapter for further details) then it may not be reasonable to supply such information.

1.6 Responding to the applicant

Where it is believed that the information requested is reasonably accessible to the applicant by other means and IND Directorates believe it is necessary to apply the exemption, a response should be sent to the applicant within 20 working days of receipt of the request within IND or the central Home Office. The response should refer to this exemption but also redirect applicants so they can find the information requested in the appropriate place in the public domain. The standard letter template at point 1.7 has been produced to cover these circumstances and can be adapted for use by IND Directorates. It should also be noted that the wording here provides applicants with the opportunity to explain any individual circumstances which may prevent them from reasonably accessing the information. Where an applicant writes back to IND and provides sound reasons as to why they cannot access the information concerned, it may be appropriate for IND staff to review that request with particular reference to the factors considered at point 1.5. and consider providing the applicant with the information requested. Where this occurs, the 20 day working target should be reset and started again as soon as the second form of communication has been received.

1.7 Standard letter template response

[Insert details of relevant Directorate address here]

Our Ref:

Your Ref:

Date

Dear **[insert name of applicant]**,

Thank you for your *letter/fax/email* **[delete as appropriate]** of **[insert date of letter from applicant]** where you have requested information about **[insert type of information requested by the applicant]**. This falls to be dealt with under the Freedom of Information Act 2000.

The information that you have asked for is already accessible to you as it is already in the public domain. It can be accessed **[IND Directorates to select as appropriate: via the Home Office Publication Scheme which can be found on the Home Office website(insert link to document); by logging on to IND's website (www.xxxx); or insert other suitable reference for public domain document]**.

Section 21 of the Freedom of Information Act absolves *IND/relevant IND Directorate* **[delete and/or amend as appropriate]** as part of the Home Office from any duty that it would otherwise have to supply you with this information on the grounds that it is already in the public domain. However, should you have any difficulties in accessing this information through the means listed above please do not hesitate to contact me again quoting the reference number supplied above.

If you are dissatisfied with this response you may request an independent internal review of our handling of your request by submitting your complaint to:

IND Complaints Unit
11th Floor, West Wing
Block 'C'
Whitgift Centre
Wellesley Road
Croydon
CR9 1AT

During the independent review the department's handling of your information request will be reassessed by staff who were not involved in providing you with this response. Should you remain dissatisfied after this internal review, you will have a right of complaint to the Information Commissioner as established by section 50 of the Freedom of Information Act.

Yours sincerely,

[Signature of staff member]

[Insert full name of IND staff member dealing with request]

[Insert IND Directorate]

2. EXEMPTING INFORMATION INTENDED FOR FUTURE PUBLICATION

2.1 Background

Section 22 of the Freedom of Information Act 2000 (“the Act”) provides an exemption from the right to know if the **information requested is intended for future publication**. It exempts information which is held:

- With a view to publication at some future date;
- Where the information was already held with a view to this publication when the request was made; and
- Where it is reasonable in all the circumstances to withhold the information until the intended publication date.

For the purposes of IND, this exemption could potentially apply to information held by IND or IND Directorates with a view to its publication, and any information held by IND or IND Directorates which another body intends to publish.

Unlike the exemption under section 21, section 22 is a qualified exemption. Section 5 of this IDI chapter has further details on using qualified exemptions under the Act for those staff who may be unfamiliar with this concept. The application of the exemption under section 22 must be authorised at Grade 7/Assistant Director level or above within an IND Directorate, and its use must also be approved by the IND Central FOI Team before a final response is sent to an applicant.

Section 22 recognises that, in some circumstances, there will be a genuine public interest in the applicant knowing the information before the intended publication date. It also prevents any public authority from adopting unreasonable publication timetables or stating an intention to publish, where there is little prospect of that intention being realised within the reasonable future. Even if there is an established intention to publish information, Section 22 requires that two important considerations are satisfied before the exemption can be applied:

- 1) It must be reasonable in all the circumstances to withhold the information until the date of publication; and
- 2) The public interest considerations in not releasing the information requested must outweigh the public interest considerations in favour of disclosing the information.

This guidance provides advice for IND Directorates on the scope of the exemption, along with further instructions on how to assess the two important considerations which must be met in all cases for the exemption to be applied to requested information.

2.2 Scope of the exemption

The starting point for IND staff when considering whether requested information may be covered by this exemption is that it must relate to information which is held by IND with a view to its **publication at some future date**, whether the exact date has been fixed or not. This publication could belong to IND or an IND Directorate. Additionally, IND could hold information on behalf of an individual, a company, a public authority

or a Government Department. If there is an intention on behalf of this other body to publish that information then this exemption may also be applied.

In the case of information held by IND with a view to publication *by another person*, it may be advisable to consult that person, before coming to a decision on the request. Otherwise it may not be possible to reach a decision as to the reasonableness of delaying publication until the intended date and the subsequent operation of the public interest balancing test. The application of other exemptions such as that person's commercial interests, or any duty of confidence owed to that person, may also need to be considered.

Publication

The definition of '*publication*' is crucial to this exemption and can be taken to encompass a broad range of formats. It can include any speech, print and electronic media addressed to the public at large or any section of the public. It can also include both commercial and non-commercial publications. There will be many formats in which publication may take place including, but not limited to, the following:

- Announcements.
- Press releases.
- Speeches, interviews, articles.
- Email bulletins, information available online and information retrievable electronically.
- CDs, video tapes, CD ROMs.
- Books, journals, periodicals and newspapers.
- Consultation papers, White papers and Green papers.
- Reports and responses to select committee reports.
- Research and statistics.
- Television and radio broadcasts.

Requested information may also be capable of falling within the terms of this exemption even if it has already had some limited, perhaps unauthorised publication. For example, IND intends to publish a White Paper but some of the material may have been prematurely leaked in advance of the publication date to the media. Even if this is the case, IND may still be able to apply the exemption here as the document has not strictly speaking been published.

Publication at a future date

Staff should only consider applying this exemption if the information requested is held '*with a view to its publication*' (the precise words in the Act) at some future date. This covers a case where there is a firm intention on the part of IND or an IND Directorate that the information will be published, although the exact date of publication does not have to be pre-determined.

Staff should not apply this exemption if the intention to publish is formed only after a request for information has been received: unless the information requested can be withheld under another exemption under the Act, it will have to be supplied in response to that request. Similarly, where a decision on whether or not to publish requested information is still pending, this will not provide any grounds for the exemption to be used. One of the key working assumptions which staff must consider

when assessing whether to apply this exemption to an information request is that there must be an **actual view** to publication before the request is received.

In the majority of cases it will be obvious that there is an intention to publish requested information. It may be covered in the Home Office publication scheme or the intention to publish may have been announced in the public domain (to Parliament or on the IND external website). But a clear intention made internally to publish information within IND or by a third party before a particular request is received may also be sufficient for this exemption to be engaged.

Where only an internal intention has been established to publish information it will be important for IND Directorates to be able to show via an internal audit trail that an actual view has been formed, and crucially that it was formed prior to the time of a request being received.

This exemption can also be applied even where IND intends to pass the information requested to some other person in order for it to be published – for example where material is published through an agent or other publisher.

The exemption will also apply in cases where IND has no intention of its own to publish information it holds but another body intends to publish it.

Example:

If the Department for Work and Pensions (DWP) consults IND in relation to a draft White Paper, it is possible for IND to withhold that information with a view to its publication as the Department for Work and Pensions intend to publish this. IND staff could consider applying the exemption here when considering a request for the DWP information in question as long as DWP have established an intention to publish it.

Changing a decision to publish

If, at any time, IND or an IND Directorate changes its mind about publication, this exemption will immediately cease to apply to any subsequent information requests which are received. This will apply if information is held by IND from a third party who intends to publish this. Once it is known that the third party no longer holds the information with a view to its publication, it ceases to be exempt. This does not undermine previous refusals of requests for the information on the basis of this exemption, provided that there was a genuine intention to publish at the time the original request was received.

Drafts

The exemption may also cover some information which has not yet been prepared for publication. Although it does not apply to all draft documents or pieces of information in general, it may cover drafts of documents intended for publication. These may be the subject of an internal consultation exercise or an exercise involving a limited number of third parties. The key issue is again that there must be a firm intention to publish the information at the time the request is received. The fact that the information contained in a draft may be subject to amendment or may be

omitted from the final published version of the information does not mean that it would be wrong to claim the exemption.

When thinking about drafts, it may also be necessary to distinguish between the information which IND proposes to publish and associated background information. Discussion papers, for example, may have been prepared in order to assist in decisions as to publication but are not themselves intended for publication. These should be disclosed unless they will be subject to any other exemptions under the Act.

At the same time, it is also helpful to bear in mind that the Act is concerned with information rather than documents. The fact that the words of the final document may differ from those of earlier drafts does not necessarily mean that the information is not the same. Staff should be careful, however, to ensure that where this exemption is being applied to draft documents, that these are checked thoroughly to ensure that drafts containing any different forms of wording do not contain any different types of information in them.

Research

The exemption is not designed to protect information held for research purposes in general. In some instances, however, research may be carried out with a settled intention to publish. IND may, for example, commission annual research into public attitudes towards its services. If it is intended when commissioning the research to publish the findings, then it may be reasonable to claim this exemption. In contrast, another Government Department is carrying out research into an area of social policy. Having conducted its research and identified a number of policy options, it decides to issue a consultation paper. While drafts of the consultation paper may be covered by the exemption, the information generated by the research programme which preceded it is unlikely to be covered since there was no clear intention to publish that material.

2.3 Reasonable withholding and assessing the public interest balancing test

Even when it has been established that there is a clear intention to publish the information requested and it is within the scope of this exemption, staff must still go on to consider:

- 1) whether it is reasonable in all the circumstances (as specified under section 22(1)(c) of the Act) to withhold the information until the date of publication; and
- 2) the public interest balancing test – i.e. whether in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

The key issue when seeking to apply this exemption is whether it is reasonable to withhold the information **until the intended date of future publication**. The public interest balancing test, which needs to be undertaken in the context of this exemption, is a focus on the question of timing. The crucial test is not **whether** to disclose the information requested (that is a foregone conclusion) but **when** and **how**.

The public interest in permitting IND to publish information in a manner and form and at a time of its own choosing is important. It is a part of the effective conduct of public affairs that the general publication of information is a conveniently planned and managed activity within the reasonable control of IND. Where IND or IND Directorates have taken the decision in principle to publish, there remains a reasonable entitlement to continue to make our own arrangements to do so.

The following are examples of the sorts of public interest considerations which staff should consider when assessing whether to applying this exemption:

- **The nature of the proposed publication timetable itself-** As a general guideline, the more distant, contingent or undetermined the prospective publication date, the less heavily it is likely to weigh in the balance, and the less reasonable delay is likely to be. But this is by no means an invariable rule – everything depends on the reasons for that distance, contingency or lack of determination.
- **Possible prejudicial effects of prematurity or delay** - What are the practical disadvantages of delay? Are any interests likely to be prejudiced? What are the practical disadvantages of immediate disclosure? If, for example, a third party's private interests would be harmed, or unnecessary public concern be caused, by premature disclosure, then there may be a stronger public interest in favour of withholding the information.
- **Simultaneity or universality as a consideration in itself** - Would the privileging of an applicant with the information result in "unfairness" to others who might be affected by an announcement? Is it important for the information to be disclosed to everyone at the same time?
- **Pre-publication procedures** - On the other hand would immediate disclosure undermine any relevant pre-publication procedures, such as consultation with or pre-disclosure to particular bodies or individuals? For example in the case of a complaint it would normally be good practice first to disclose the information to the complainant or the subject of the complaint before publication.
- **Publication procedures** – similar to the above, it can be important in some instances to ensure publication of material takes place in accordance with certain procedures. For example, the reports of public inquiries are often published under the protection of the Parliamentary Papers Act to avoid defamation or other civil action.
- **Previous undertakings as to nature of publication** – it may be that ministers have promised to inform Parliament first of the information sought. Similarly there may have been undertaking to inform the family first of the result of an inquiry into a death in custody. It is unlikely in circumstances such as these that the public interest will favour disclosure to the applicant.

Staff should also bear in mind in this context that the right of access under the Act is to information, and not documents. It may be in the public interest to disclose some of the information contained in a report due to be made public without disclosing all of the information contained in the report.

Even where information is withheld under the terms of this exemption, that does not guarantee that the original timetable for publication may be adhered to at all costs. Further requests will need to be considered on their own merits in the light of any relevant change in circumstances. Sustained public pressure for publication may in some circumstances become a relevant consideration in its own right.

2.4 The duty to confirm

The duty to confirm under the first information access right of the Act (see Section 5 of this IDI Chapter for further details) is excluded if confirmation or denial in response to an applicant's request would, in itself, involve supplying information to the applicant to which this exemption applies. In practice, it will be unlikely that IND staff will ever need to supply a neither confirm nor deny response to an applicant in respect of requested information covered by this exemption. This is because the exemption here relates to issues of timing and not the principle of actual disclosure, so it is unlikely that there will be a public interest in using a neither confirm nor deny response when it has been established that an item is due to be published.

2.5 Responding to the applicant

As the application of the exemption here turns on a view or intention, it will be particularly important that IND Directorates maintain an internal audit trail to demonstrate how they arrived at their decision to apply this exemption. Staff must consider how they would show that the information was held with a view to publication at the time that the request was received. In some cases it may be possible to point to the Home Office publication scheme to show that publication is planned. In others it will be obvious that the purpose of having the information is to disseminate it in due course – e.g. White papers, Inquiry reports, prepared press releases. But where only an internal intention within IND has been established to publish information it is crucial that all documents which indicate this intention can be produced at a later date if this is subject to challenge by an applicant.

If information is exempt, staff should consider whether it is possible and appropriate to disclose the expected publication date to the applicant without harming the publication. A standard template letter for refusals here using this exemption with reference to the public interest balancing test is available for IND Directorates to adapt for use at **Appendix A**.

3. FURTHER GUIDANCE

In many cases, IND Directorates will need to consider the application of both of these exemptions when receiving requests for statistical or factual information about the IND's work. It is important staff consult the relevant contact in the Immigration Research and Statistical Service (IRSS) if they have any doubts about whether statistical information is already accessible by other means in the public domain as part of the Home Office's Research, Development and Statistics (RDS) publication schedule. Contact details for IRSS staff can be found on the Home Office Directory of Business. Further details about the RDS publications can be found at: <http://www.homeoffice.gov.uk/rds/immigration1.html>

IRSS should also be consulted if staff have any queries about whether there may be an established intention to make statistical information available in the future as part

of the regular RDS published statistics. Queries about research and its disclosure should also be referred to IRSS in the first instance.

The Office of National Statistics has also created specialised guidance for all users and producers of National Statistics regarding the handling of Freedom of Information requests. This can be found at the following website:

<http://www.knowledgenetwork.gsi.gov.uk/statnet/statnet.nsf/6f111bd2854bbd0280256afc00761507/1e03423cb29cbeb280256f63005f40d4?OpenDocument>

4. APPENDIX A

STANDARD TEMPLATE FOR APPLYING AN EXEMPTION UNDER SECTION 22 WHERE INFORMATION IS INTENDED FOR FUTURE PUBLICATION AND THE DUTY TO COMMUNICATE HAS BEEN EXEMPTED

Dear **[enter applicant name here]**,

Thank you for your *letter/fax/email* **[delete as appropriate]** of **[insert date of letter from applicant]** where you have requested information about **[insert type of information requested by the applicant]**. This falls to be dealt with under the Freedom of Information Act 2000.

I can confirm that this information is held by *IND/IND Directorate* **[delete and or insert relevant Directorate name as appropriate]** . We intend to publish the information you have requested on **[IND Directorates to provide estimate of the date the information will be published, where it will be published and explain to the applicant how this intention was arrived at e.g. part of the HO publication scheme/stated in public domain or internal decision.]**

I have decided, however, not to communicate this information to you pursuant to the exemption under section 22 (1) of the Freedom of Information Act 2000. This allows us to exempt information if it is intended for future publication.

I have considered whether it is:

- reasonable in all the circumstances to withhold the information until the intended publication date of **{insert expected publication date}**; and
- whether in all the circumstances of the case the public interest in maintaining the exemption stated above outweighs the public interest in disclosing the information.

We recognise there may be a public interest in disclosing this information to you now and that this may also weigh in favour of it being unreasonable to make you wait until **[insert expected publication date]** to see the information you have requested. We have considered the following:

[IND Directorates to insert the public interest test argument in favour of disclosure on particular request. Refer to point 2.3 for details of this]

But there are also public interest reasons for maintaining the exemption to the duty to communicate which weigh in favour of it being reasonable to require you to wait for publication until August 2005. We have considered the following:

IND Directorates to insert why it is considered that it is reasonable to withhold information until expected publication date and the public interest considerations against disclosure on particular request and. Refer to point 2.3 for details of this]

After balancing these conflicting arguments around the date of publication, we have concluded not only that it is reasonable to require you to wait for publication in **{insert expected publication date}** also that the balance of the public interests identified favours maintaining the exemption. **[IND Directorates need to insert reasons for concluding that withholding outweighs disclosure]**

If you are dissatisfied with this response you may request an independent internal review of our handling of your request by submitting your complaint to:

IND Complaints Unit
11th Floor, West Wing
Block 'C'
Whitgift Centre
Wellesley Road
Croydon
CR9 1AT

During the independent review the department's handling of your information request will be reassessed by staff who were not involved in providing you with this response. Should you remain dissatisfied after this internal review, you will have a right of complaint to the Information Commissioner as established by section 50 of the Freedom of Information Act.

Yours sincerely,

[Signature of staff member]

[Insert full name of IND staff member dealing with request]

[Insert IND Directorate]