

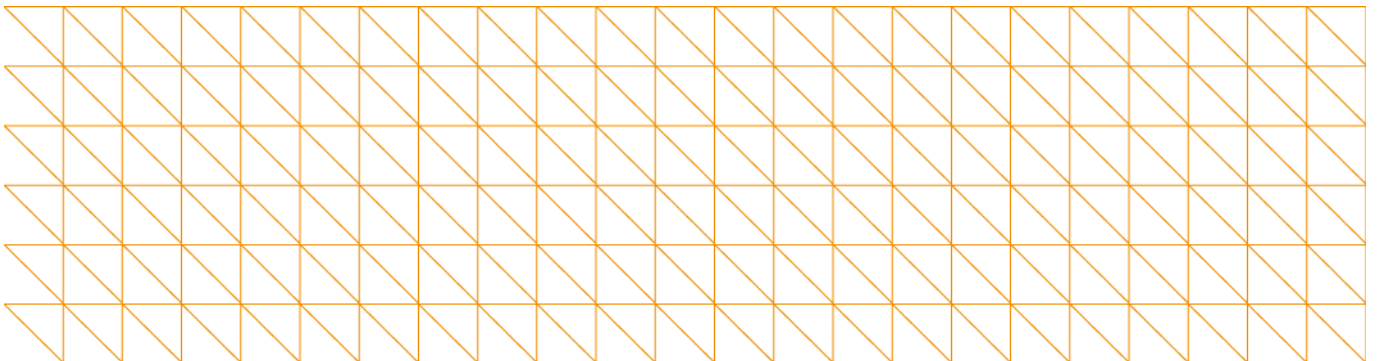


Draft Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2007

Response to Consultation

CP(R) 28/06

25 October 2007





Ministry of
JUSTICE

**Draft Freedom of Information and Data
Protection (Appropriate Limit and Fees)
Regulations 2007**

Response to consultation carried out by the Ministry of Justice

**This information is also available on the Ministry of Justice website:
www.justice.gov.uk**

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**Draft Freedom of Information and Data Protection (Appropriate Limit and Fees)
Regulations 2007**

Summary of responses

Introduction

This document is the post-consultation report for the consultation paper, Draft Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2007.

It covers:

- the background to the report
- a summary of the responses to the report
- a detailed response to the specific questions raised in the report
- the next steps following this consultation.

Further copies of this report and the consultation paper can be obtained by contacting **Ayobola Akwarandu** at the address below:

**Information Rights Division
Ministry of Justice
6th floor, Selborne House
54-60 Victoria Street
London
SW1E 6QW**

**Telephone: 020 7210 8034
Email: ayobola.awarandu@justice.gsi.gov.uk**

This report is also available on the Ministry's website: www.justice.gov.uk.

Alternative format versions of this publication can be requested from 020 7210 8034.

Background

The consultation paper 'Draft Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2007' was published on 14 December 2006. It invited comments on the draft Regulations, and specifically on whether they would achieve the objective of allowing public authorities to calculate better the actual costs that would be incurred in complying with requests for information.

A supplementary paper under the same title was published on 29 March 2007. It invited comments on the principle of amending the 2004 Regulations and any further views on the draft Regulations themselves, as set out in the full consultation paper. Specifically, views were sought on whether the 2004 Regulations should be amended to deal with the identified problem of requests that are disproportionately burdensome on public authority resources.

A brief summary of the additional elements that the draft Regulations would introduce is:

- An increase in activities that can count towards the appropriate limit by allowing a public authority to:
 - include in an appropriate limit calculation the costs of examining requested information, or a document containing it, for the purpose of ascertaining the nature or content of the information. They also provide that a public authority will only be able to include the costs of examining information on one occasion for these purposes.
 - include in an appropriate limit, calculating the costs of time spent consulting with any person or persons except the applicant.
 - include in an appropriate limit calculation the costs of time it reasonably expects to spend in considering the applicability of exemptions in part II of the Act to the requested information, and/or whether the public interest falls in favour of maintaining a qualified exemption.
 - introduce certain costing mechanisms that limit the extent to which a public authority can include the costs of time spent on necessary consultation and consideration.
- Extending the existing provisions for aggregation to allow public authorities to aggregate the costs of all requests received from a person, or persons acting in concert or in pursuance of a campaign, within 60 working days in certain circumstances.

The consultation period closed on 21 June 2007 and this report summarises the responses, including how the consultation process influenced the final further development of the proposal consulted upon.

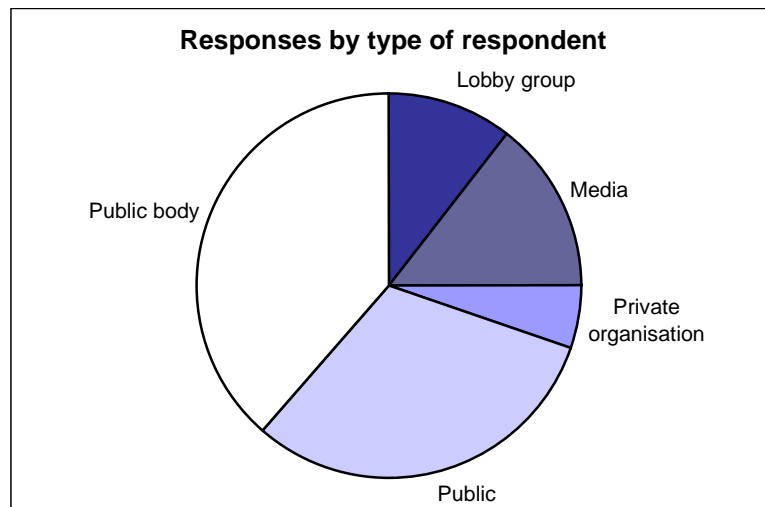
A list of respondents is at **Annex A**. Request may be made to Ministry of Justice for copies of individual responses.

Summary of responses

1. A total of 324 responses to the consultation papers were received. Of these, over a third were submitted by public bodies and over another third by members of the public. Pressure Groups (including charitable organisations) constituted the next largest group of respondents, while responses from media organisations and individual journalists constituted over a tenth of the total number received. Politicians and other private sector bodies (such as Law Practitioners and commercial users) accounted for a small number of responses.

The different categories of respondents are illustrated in Figure 1.

Figure 1: Responses by type of respondent.



The draft Regulations and the principle of amending the existing regulations received no support from pressure groups, media, politicians, or private sector bodies. Members of the public also overwhelmingly echoed this stance. More than two thirds of public bodies were in favour of the draft Regulations or the principle of amending the existing regulations. In a small number of responses, it was not possible to determine whether or not the respondent was in support of the draft Regulations or the principle of amending the existing regulations.

The responses are broken down by respondent type in Table 1 below.

Table 1: Number of responses by type of respondent and general opinion.

	For	Against	Undefined	TOTAL
Lobby group	0	42	3	45
Media	0	33	0	33
Politician	0	4	0	4
Private organisation	1	13	0	14
Public	1	105	4	110
Public body	69	39	10	118
TOTAL	71	236	17	324
	22%	73%	5%	

- The responses were analysed for the respondent's opinion on the principle of amending the existing regulations. This method was adopted owing to the large number of respondents who commented on the principle of amending the existing regulations instead of, or in addition to, responding to the questions set out in the consultation. The Government felt that it was necessary to extend the scope of the consultation and issued a supplementary paper inviting comments on the principle of amending the 2004 Regulations and further views on the draft Regulations themselves.

The responses were also analysed for comments on the draft Regulations and whether it was felt that they would enable public authorities to calculate better the actual costs incurred in complying with requests for information.

Finally, the responses were analysed for suggestions on how public authorities could deal with the disproportionate burden that they face.

- In summary the responses were as follows:
 - Many respondents considered the proposals contrary to democratic process. Those respondents generally argued that the Freedom of Information Act 2000 has become a feature of British democracy by holding public authorities to account and by creating greater transparency in decision-making and the use of public resources. The proposals would, it was thought, diminish the effectiveness of the Freedom of Information Act.
 - Many respondents believed that the proposals unfairly targeted bodies acting in the broad public interest such as media and pressure groups. It was thought that the extension of the aggregation provision would limit the capacity of media and pressure groups to act in the public interest.

Draft Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2007

Summary of responses

- A significant number of respondents held that the proposals would, deliberately or not, limit the release of sensitive or controversial information. Some respondents went further suggesting that such restrictions were the purpose of the draft Regulations. Respondents argued that complex requests are often sensitive or controversial and that such requests would quickly exceed the appropriate limit under the draft Regulations.
- A significant number of respondents did not like the draft Regulations, saying they were too complex for both the user and the public authority. Respondents from the public sector felt that additional training would be necessary if practitioners are to understand the draft Regulations.
- A significant number of respondents argued that regulating the application of the draft Regulations by public bodies would be difficult, and that the draft Regulations were open to abuse by public authorities. For example, some respondents believed that public authorities would purposefully engage in lengthy consultation to push the cost of a request past the appropriate limit. Others stated that it would be difficult for the Information Commissioner's Office to regulate and pass judgement on those activities.
- Some respondents felt it too soon to review the effectiveness of the Freedom of Information Act. Those respondents believed that the findings of the Independent Review did not reflect the longer-term prospects for the Act because the public sector had not adapted its culture to allow the legislation to work effectively. Therefore it was inappropriate to base proposals on the Independent Review.
- Some respondents felt that the cost of delivering Freedom of Information, as identified in the Independent Review, was relatively insignificant. Those respondents felt that the cost of Freedom of Information was not only insignificant but also good value for money in delivering broader components of democracy. It was felt therefore, that the economic case for introducing the draft Regulations was not justified.
- Some respondents argued that the Independent Review failed to address the societal and economic benefits of the Freedom of Information Act. Benefits such as encouraging a greater trust between the individual and the state, and reductions in public sector waste were brought on by greater transparency. Those respondents felt that an inadequate understanding of Freedom of Information's benefits weakened the case for change.

- Many respondents from the public sector welcomed the proposals and the Government's recognition of the disproportionate burden imposed by a small amount of requests, risking the delivery of other public services. Those respondents felt that the draft Regulations offered sufficient flexibility to assess requests on a case by case basis so that a request of public value would not be refused automatically. Those respondents also felt that the threshold provisions dealt with the risk where public authorities could abuse the provisions.
- A small number of respondents suggested that public authorities would benefit from better publication schemes and improved systems of record management. Those respondents felt that publishing more information would reduce the burden on public authorities.
- Some respondents from the public sector felt that greater guidance would assist the delivery of the existing provisions within the Act. Those respondents cited greater clarification of the existing fees regulations and better understanding of the provisions for dealing with vexatious requests. Other respondents also identified the potential for public authorities to make better use of the Act's existing provisions to handle the small number of requests imposing a disproportionate burden on public services.

Responses to specific questions

1. Reading/examination time

Q1. Are the Regulations prescriptive enough to ensure consistent calculation of the appropriate limit across public authorities or should they contain more detail? For example, taking into account the differing formats and quantity of information requested, should a standard reference (i.e. a 'ready reckoner') for how long a page should take to read be included in the Regulations or guidance?

Of those that commented on whether the draft regulations are prescriptive enough, the majority agreed that they were. However, a large minority thought that the draft regulations were not sufficiently prescriptive and that more detail was required for clarity and consistency of application.

Many of the respondents commented on the principle of whether to have a standard reference or ready reckoner for how long a page should take to read. A small majority considered that a ready reckoner would be useful, but some commented that there would need to be more than one ready reckoner to take account of the range and different formats that information might be in and suggested that any ready reckoner should be flexible. A large minority thought that a ready reckoner would not be helpful or practical, given the range of types of information public authorities deal with.

Most respondents didn't comment on whether a standard reference or ready reckoner should be contained in regulations or guidance. Of those that did, only a small number thought that it should be in regulations and that this was considered to be necessary for the sake of transparency. A larger number of respondents considered that a ready reckoner should be located in guidance for greater flexibility.

Many respondents were concerned about whether the regulations would ensure consistent calculation of the appropriate limit across public authorities. Some respondents were concerned that the draft regulations would create an opportunity for abuse by officials, as the assessment of time for reading, consultation and consideration would be too subjective. It was suggested that officials might use a lengthy consultation process to attempt to exceed the appropriate limit to hide politically sensitive or embarrassing information.

Some of the respondents were concerned about the need for clarity about what is included in the different activities. For example, how to count a meeting between three managers for an hour to consider use of an exemption in the consideration category. A number of respondents were concerned that it would be difficult to distinguish between the activities of

reading, consideration and consultation. For example, it was suggested that reading and consideration often take place at the same time.

A number of respondents commented on the proposal to only include reading a document for the first time, in favour of it and against it in equally small numbers.

2. Consultation and consideration time

Q2. Does the inclusion of thresholds in the regulations provide sufficient flexibility, taking into account the differing complexity of requests received?

A large majority of those that responded to this question agreed that the thresholds would provide sufficient flexibility. However, a sizeable minority thought that they were not, some commenting that they were too rigid while a small number of other respondents thought they were too flexible.

A small number of respondents disagreed with the level of the thresholds, suggesting that they should be lower (particularly for local authorities) while others thought they should be higher. One parish council suggested that the threshold should be lowered or removed entirely for small public bodies. One county council suggested that there should not be a cost ceiling, as it would mean that the true cost of providing information would still not be reflected in the appropriate limit.

A number of respondents commented that the proposed system of thresholds was too complex or would be cumbersome to apply. There was some concern that the new system would be difficult to understand for both officers in public authorities and the public. It was suggested by two local authorities that the proposed system of thresholds would incur additional costs in adapting systems and amending procedures.

There was concern that it would be difficult to perform the necessary calculations and would add to administrative cost and time, and may lead to increased numbers of reviews and appeals.

Again, it was raised that it might be difficult to draw a clear line between the new activities (reading, consultation and consideration).

3. Q3. Are the thresholds the right ones to make sure the balance is struck between allowing public authorities to count these activities but not refuse requests on one of these grounds alone?

Of the respondents that answered this question, the majority answered yes, that the thresholds are the right ones to make sure the balance is struck.

Those who said no set out a wide range of reasons for their answer, including:

- that the thresholds would be too restrictive
 - the proposals should be more flexible
 - the proposals are too complex and confusing
 - consideration of activities would be too problematic
 - there would be a risk of the thresholds being used to obstruct genuine requests
 - they would make processing requests more complicated and expensive
-

4. Aggregation

Q4. Are the regulations as drafted the best way of extending the aggregation provision?

Of those that responded to this question, a majority were against the proposal to extend the aggregation provision.

These respondents gave a variety of reasons for their position. A number of respondents disagreed with the proposed aggregation provision in principle or considered that it went against the spirit or intention of the FOI Act.

Others considered that the provision would be difficult to implement because the regulations as drafted are too vague or for practical reasons.

Many respondents were concerned at the suggestion to include consideration of whether the requester is an individual who is not making the request in the course of a business or profession. Some commented that such differentiation is inappropriate as the FOI Act is supposed to be applicant blind. It was also identified that requestors would be able to evade the provision by using pseudonyms and multiple email addresses.

A number of respondents were concerned that the proposed provision would inhibit genuine requests and would have a negative impact on journalists, the media and civil society organisations. It was suggested that these organisations make requests on behalf of the public and it would limit their ability to hold the government to account.

Some respondents considered that the existing provisions were sufficient or that better use should be made of section 14 of the FOI Act, which addresses vexatious requests.

Others commented that public benefit should be given greater consideration.

A body representing local authorities commented that most of the types of requests that would be captured under the aggregation provision are from the media, with whom they largely wish to cooperate.

A large minority supported the provisions. Many of these respondents did not provide reasons as to why they supported the proposed provision. One requestor commented they would enable the handling of exceptional cases without being mandatory. Other supporters of the provision added, however, that clear guidance would be required for implementation and that the provision should be used in conjunction with section 14 of the FOI Act.

A local authority suggested that it would be easier to implement if requestors were required to provide their real names and addresses. Another local authority suggested additional guidance allowing the authority to investigate where a requestor may be using a pseudonym.

Many respondents commented on section 14 of the FOI Act, which addresses vexatious requests. Supporters of the proposed aggregation provision thought that it should be used in conjunction with section 14. Others thought that better use should be made of section 14 instead of the proposed changes or that the drafting of the section 14 should be improved to be more effective. One respondent commented that it should be amended to refer also to 'vexatious requestors'.

5. Q5. Do the factors that need to be taken into account when assessing if it is reasonable need to be explicitly stated in the regulations or can this be dealt with in the guidance?

Approximately two-thirds of the respondents to this question considered that the factors should be explicitly stated in regulations. Reasons given for this were for clarity and transparency, to avoid inconsistency and to lesson the scope for differences in interpretation regarding the factors. Many commented that further detail and explanation should be provided in guidance.

Approximately one-third of respondents considered that the factors should be in guidance. Respondents suggested this would allow more room for explanation and for the factors to be reviewed or amended if necessary.

6. **Q6. Are these the right factors?**

Of those that responded to this question, slightly more respondents answered yes, that these are the right factors, than no. Many respondents did not provide any further comment on their answer.

One respondent in favour of the factors commented that the factors offer safeguards against repeated requests or requestors.

Other respondents suggested additional factors that should be taken into account, such as:

- the cost of previous requests
- previous dealings between the authority and the requestor and correspondence prior to the FOI Act
- unreasonable/obsessive behaviour
- whether the requestor comes from inside the geographical boundary of the local authority receiving the request

A number of respondents commented that the list of factors should be non-exhaustive and any other matter, which in the reasonable view of the authority was relevant, should be able to be considered.

Of those that did not consider the factors to be the right ones, some considered that the public interest in the release of the information should be given greater weight.

A small number of respondents thought the factors were too broad or vague.

7. **Other matters arising – Environmental Information Regulations**

Q7. What guidance would best help public authorities and the general public apply both the EIRs and the Act effectively under the new proposals?

Many respondents commented that the guidance should be detailed, but written in plain English and easy to understand. There were many suggestions on the form that the guidance should take, including:

- Interactive step-by-step materials
- Flow charts
- Process maps
- Table of relevant changes
- Examples of good and bad practice
- Frequently asked questions
- 'Do's and 'Don't's
- Case studies

In relation to EIRs, respondents thought the guidance should cover:

- what 'manifestly unreasonable' means
- what 'in the public interest' means
- what 'a reasonable amount' means

In relation to fees, respondents thought the guidance should cover:

- what can be charged under EIRs and FOI regulations
- the thresholds for different activities
- how to estimate costs (it was suggested that 'pro formas' could be provided)
- what activities are covered by 'consideration' and 'consultation' eg. in relation to consideration time, how meetings with a number of officers should count; in relation to consultation time, how to include emailing, phone calls
- what evidence a public authority would need to produce to document its fees calculations
- how to explain the outcomes of fees calculations to the public.

Other suggestions included:

- guidance on establishing and demonstrating a person's identity or motive (what evidence would be needed if the applicant used various aliases?)
- guidance on section 14 - vexatious requests
- guidance for the public on how to make a request for the public asking specifically for the information they want

It was also stated that guidance should reflect decisions from the Information Commission and the Information Tribunal.

Many respondents commented that the two regimes under the Environmental Information Regulations and the FOI Act should be as closely aligned as possible.

Conclusion and next steps

In the consultation process, the majority of respondents opposed the proposed changes to the fees regulations. This was particularly the case with responses from media organisations, other non-governmental organisations and members of the public.

However, some public authorities, especially local authorities, welcomed the prospect of some relief from the administrative burden of the FOI Act.

Taking account of the range of responses received, the Government has decided to make no changes to the existing fees regulations.

It does intend, however, to deliver a package of measures to make better use of the existing provisions to improve the way FOI works and to meet the concerns particularly of local authorities. These measures include:

- Working with the ICO to promote their new guidance to make more robust use of section 14 of the Act, which addresses **vexatious requests**. This is intended to deter requests that have no serious purpose or value, impose disproportionate burdens and have the effect of harassing the public body
- Producing new, clearer **guidance on the existing fees regulations** for public authorities so that they are clear about when they can refuse requests on costs grounds
- Supporting the Information Commissioner's '**Charter for Responsible Freedom of Information Requests**'
- Working with the ICO to identify a standard in basic information which public authorities should **release proactively**
- Working with the National Archives to revise the **records management** code of practice under section 46 of the FOI Act

Consultation Co-ordinator contact details

If you have any complaints or comments about the **consultation process** rather than about the topic covered by this paper, you should contact Laurence Fiddler, Ministry of Justice Consultation Co-ordinator, on 020 7210 2622 or email him at consultation@justice.gsi.gov.uk

Alternatively, you may wish to write to the address below:

**Laurence Fiddler
Consultation Co-ordinator
Ministry of Justice
5th Floor Selborne House
54-60 Victoria Street
London
SW1E 6QW**

If your complaints or comments refer to the topic covered by this paper rather than the consultation process, please direct them to the contact given on page 3.

The consultation criteria

The six consultation criteria are as follows:

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

These criteria must be reproduced within all consultation documents.

Annex A – List of respondents

A K Crackett

Abby Thomas

Access Info Europe

Adam Fletcher

Alan Waddington

Alan Watkins

Alex Watkins

Alison Crawford

Andrew Watson

ARTICLE 19

Association of Chief Archivists in Local Government

Association of Greater Manchester Authorities

Association of Journalism Education

Audit Commission

Bail for Immigration Detainees

Barry Wood

Bates Wells & Braithwaite

BBC

Ben Dean

Ben Rapp

Bishop's Waltham Parish Council

Bobbi Portes

Bolton Council

Draft Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2007

Summary of responses

Bolton Salford and Trafford Mental Health NHS Trust

Bond Pearce LLP

Brian Edwards

British Horse Society

British Overseas NGOs for Development

Bromley Borough Council

Cambridgeshire County Council

Cambridgeshire Fire and Rescue Service - Graham Edridge

Campaign Against Arms Trade

Campaign for Freedom of Information

Campaign for Press and Broadcasting Freedom

Carmarthenshire Council

Catherine Macintosh

Channel 4

Cheshire Fire and Rescue Service

Child Poverty Action Group

Chris Kime

Christopher Carnaghan

Christopher Roper

Clare Cheeseright

Clare Wilson

Clevedon Town Council

Clifford Chance LLP

Commonwealth Human Rights Initiative

Community Action Northumberland

Community Council of Devon

Cornwall County Council

County Durham Association of Local Councils

Craig Aaen-Stockdale

Criminal Records Bureau

Cynefin y Werin

Dai Davies MP & Dr David Lawry

Darlington Borough Council

David Ashley Hall

David Block

David Fleming

David Heigham

David Lawson

David Scott

David Smith

Department of Health

Depas Ltd

Derbyshire County Council

Derrick McCabe-Daly

Devon Fire and Rescue Service

Dorset Information Management & Compliance WG & SWICg

Dr Gavin Bullock

Dr Richard Howard

Duncan Thomas

E Lawrence

East Kent Hospitals NHS Trust

Education Leeds

Draft Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2007

Summary of responses

Environment Agency

Environmental Law Foundation

Ernest Dilley

Essex County Council

F Iszatt

F Lawrence

Financial Times

Fiona

Frank Plowright

Freedom to Care

Gavin Whenman

General Medical Council

Greater London Authority - Brian Coleman

Greg Fletcher

Guardian News and Media Ltd

Hampshire Association of Parish and Town Councils

Hampshire County Council

Harpenden Town Council

Harry Metcalfe

Hatfield Town Council

Health and Safety Executive

Healthcare Commission

Heather Brooke

Herbet Smith LLP

Hereford and Worcester Fire and Rescue Service

Herefordshire Association of Local Councils

Higher Education Funding Council for England

Highways Agency

Holywell-cum-Needingworth Parish Council

Hugh de Lacy

Human Fertilisation & Embryology Authority

Ian Salisbury Ltd

Information Commissioner's Office

Insolvency Service

Intellect

J & B Thomas

J Chanay

Jack Humphries

Jacob Ecclestone

James Goffin

Joe McGonagle

Joe Wood

John Chamberlain

John Robins

John Withington

Kate Calvert

Kathleen Busby

Kenarf

Kenneth MacInnes

Kenneth Paterson

Kent County Council

Kent County Council (Lib Dem Group)

Draft Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2007

Summary of responses

Kent Messenger Group

Kerrier District Council

Knowsley Metropolitan Borough Council

Laura Swaffield

Laurence Williams

Leonard Carter

Liberty

Lindford Parish Council

Liverpool Echo & Daily Post

London Assembly

London Borough of Camden

London Borough of Richmond & Solicitors in Local Government

London Boroughs FOI Forum

London Hazards Centre

Luton & Dunstable Hospital NHS Foundation Trust

Malcolm Reid

Manchester Health Informatics

Mark Edwards

Mark Watts

Matthew Richardson

Maxwell Adams

Media Standards Trust

Merseytravel

Michael Hill

Michael Irwin

Mid Beds District Council

Mike Bird

MJ Lloyd

National Association of Local Councils

National Association of Schoolmasters Union of Women Teachers

National Council for Voluntary Organisations

National Public Health Service in Wales

National Union of Journalists

National Union of Journalists Parliamentary Group

Neath Port Talbot Council for Voluntary Service

Neil Doling

New Scientist and Sunday Herald

NHS Business Services Authority

Nicholas Gilby

Nigel Wratten

NO2ID

Norfolk County Council

Norman Baker MP

Norman Cruice

North Cornwall District Council

North Yorkshire County Council

Northampton Borough Council

Northeast Regional Data Protection Freedom on Information Officers
Forum

Ofcom

Oldham Council

Oncom

Draft Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2007

Summary of responses

Open Rights Group

Ordnance Survey

Orlando Harris

Oscar Franklin

Owen Barder

Oxfordshire County Council

Patrick Pomeroy

Paul Donald

Paul Gibbons

Paul Taylor

Periodical Publishers Association

Pete Browning

Peter Quinn

Peter Shrubbs

Philip Hand

Philip Howells

Philip Leith

Phillip Bradshaw

Pinsent Masons

Press Gazette

Public Concern at Work

Railfuture

Ramblers' Association

Reverend Canon Dr Richard Pratt

Richard Adam

Richard Brooks

Richard Reeve
Richard Salisbury-Jones
Rob Bailey
Robert Vanston
Roddy McLachlan
Ross Johnson
Royal Berkshire Fire and Rescue Service
S A Hastings
Salford City Council
Sam Phipps
Sean Thompson
Sector Skills Development Agency
Serious Fraud Office
Sheffield Hallam University
Sian Thomas
Simon Hughes MP
Simon Munk
Slough Borough Council
Society for Computers and Law
Society for Defence of Journalists' Rights
Society of Archivists
Society of Editors
Society of Individual Freedom
Solihull Metropolitan Borough Council
Somerset County Council
South Norfolk Council

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Summary of responses

Southampton City Council

Stephen Ashley

Stephen Henwood

Suffolk County Council

Swansea Council

TATE

Ted Howl

The Association of British Drivers

The Coal Authority

The Commission for Local Administration in England

The Fire Service College

The Independent

The National Archives

The Newspaper Society

The Odysseus Trust

The Press Association

The Sunday Telegraph

The Times

Tim Bartlett

Tim Steele

Timebus Travel

Tobias Hitchcock Milrose

Tony Harcup

Tony Sudworth

TP Wood

Transport for London

Treasury Solicitors

UNISON

University College London

University of Arts

University of Cambridge

University of Oxford

University of Salford

University of Ulster

Unlock Democracy

Wales Council for Voluntary Action

Welsh Anti Nuclear Alliance

Welsh Environmental Link

Welwyn Hatfield Borough Council

West Lancashire District Council

West Midlands Fire and Rescue Service

Western Cheshire Primary Care Trust

Which?

Worcestershire County Council

Wythall Parish Council

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