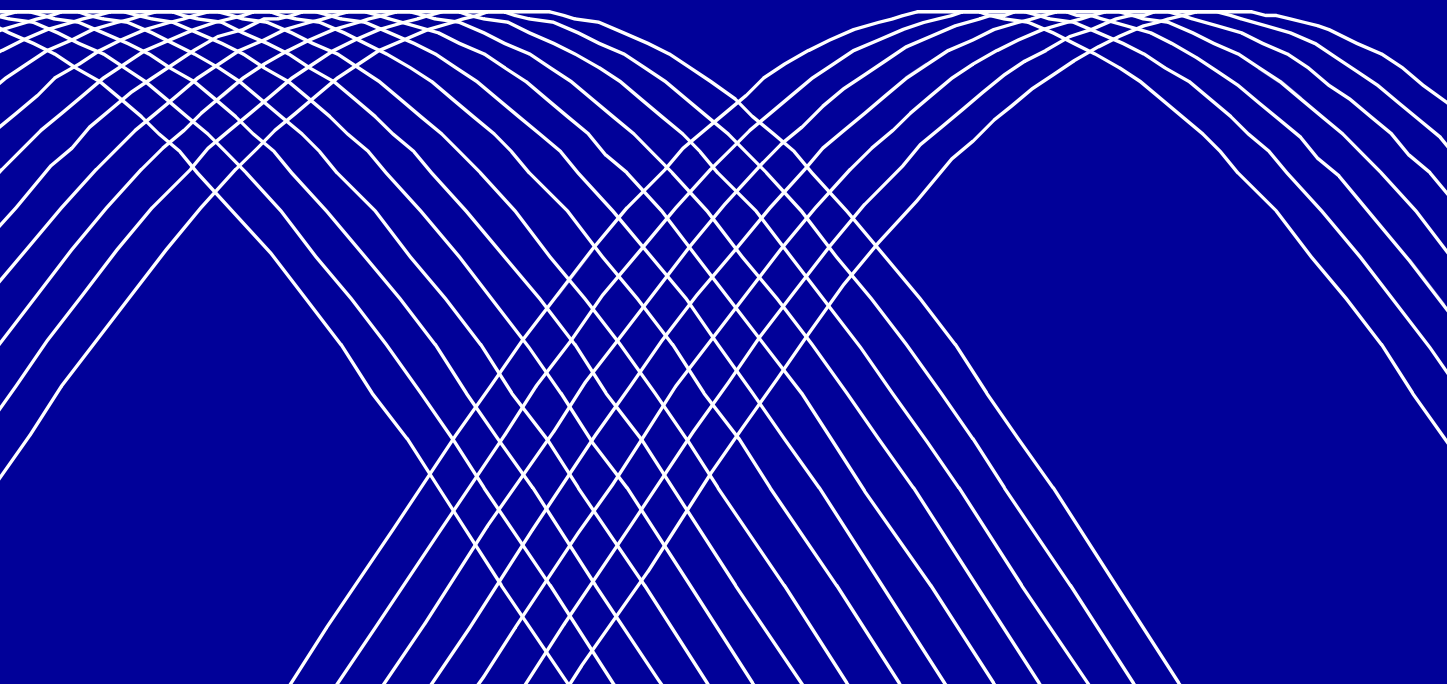




# Freedom of information guidelines

A graphic with a blue and purple gradient background. The text "Freedom of Information" is written in a bold, white, sans-serif font. The text is slightly shadowed and appears to be floating or moving across the background.

**Freedom of Information**



‘One of my challenges is to get to a situation where data protection and freedom of information are seen as natural, essential and beneficial working disciplines’.

Richard Thomas, Information Commissioner  
July 2003

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## 1. THE ROAD TO OPEN GOVERNMENT

**The Freedom of Information Act is the culmination of 50 years of incremental movement towards greater openness in government**

<b>1958 and 1967</b>	Public Records Acts	The concept of the public record was established in 1800. The 1958 Act stipulated release of government records at 50 years, the 1967 Act reduced this to 30 years.
<b>1977-78</b>	Croham Directive	Government initiative to publish the background to policy studies.
<b>1984</b>	Data Protection Act	Established right of access to electronically held personal information.
<b>1992</b>	Environmental Information Regulations	This EU regulation gave access to environmental information. Will be reissued and strengthened in 2005.
<b>1994</b>	Code of Practice on Access to Government Information	Introduced a non-statutory route to request government information. Reissued and strengthened in 1997.
<b>1997</b>	Labour Party Manifesto	Promised to introduce a Freedom of Information Act.
<b>1998</b>	Data Protection Act (DPA)	Replaced the 1984 DPA and strengthened individual's right to see data held on them by public bodies and private sector.
<b>2000</b>	Freedom of Information Act (FOIA)	Introduced the statutory right to request current government information and amended the access rights of the Public Records Acts.
<b>2001</b>	European Union Regulations	Introduced the right to see information from the European Commission, Council and Parliament.
<b>2005</b>	FOI Access Rights begin	Access rights under FOIA (2000) start on 1 January 2005.

## **2. WHAT IS THE FREEDOM OF INFORMATION ACT?**

**The Freedom of Information Act (FOIA) gives any person, regardless of nationality or country of residence, the right to request official information. The right of access will come into force on 1 January 2005. Individual requests for information will need to be assessed against the FOIA criteria.**

FOIA applies to all public bodies, from Whitehall departments to local authorities, including schools and general medical practitioners.

### **Access rights**

Information can be requested for any purpose - including news stories, legal cases and commercial reasons. Any of the information held by the Cabinet Office can be requested. The FOIA is fully retrospective, so that applicants can request material from today, back to over a 100 years ago. All Cabinet Office information is covered by the FOIA, irrespective of protective markings or format: information in e-mails, personal notebooks, CCTV footage, miscellaneous collections of papers as well as registered paper and electronic files are all potentially disclosable.

In addition to providing information when asked to do so, the FOIA also requires public bodies to be proactive in the release of information. As a result each organisation covered by the FOIA is required to produce a publication scheme giving details of what information it already makes available or intends to publish as a matter of course. The Cabinet Office publication scheme can be found on our Internet web site ([www.cabinet-office.gov.uk/publicationscheme/index.asp](http://www.cabinet-office.gov.uk/publicationscheme/index.asp)).

## **Records management**

FOIA places a greater premium on good records management practices and changes the basis on which historical records are withheld from The National Archives. Records over thirty years old (i.e. historical records) but not suitable for release will have to be retained under an exemption in the FOIA. Not all of the FOIA exemptions apply to historical records. Records that are older than 30 years are, however, also subject to the access provisions of the FOIA. This means that the continuing validity of the exemptions must be re-evaluated every time a request is made. FOIA imposes legal standards on departmental record-keeping by requiring that information requested can be easily identified and supplied: not being able to find information does not excuse us from our FOIA obligations.

### **Exemptions applying to historical records\***

Section of  
the Act

21. Information accessible by other means.
22. Information intended for future publication.
23. Information supplied by or relating to bodies dealing with Security matters
24. National security.
26. Defence.
27. International relations.
29. The economy.
31. Law enforcement.
34. Parliamentary privilege.
38. Health and safety.
39. Environmental information.
40. Personal information.
41. Information provided in confidence.
44. Prohibitions on disclosure.

**\* see Appendix A for full list of FOIA exemptions**

### **3. EXISTING AND OPEN GOVERNMENT LEGISLATION AND CODE**

**The FOIA is not all new. Some of the access rights it establishes already exist in other forms. Laws enshrine both the need to protect official and personal information and also, in certain cases, require the release of the information we have traditionally protected.**

#### **Data Protection Act 1998 (DPA)**

The DPA obliges any organisation that holds personal information about individuals to hold that data securely and to use it only for certain specific purposes. One of the provisions included in the DPA is the right of the individual to see personal data about themselves (subject to a number of exemptions). The DPA therefore requires both the protection of data and its release to the data subject. The DPA and FOIA are inter-linked, with requests under the FOIA that involve personal data being subject to the rules of the DPA. This means that information about third parties will normally be exempt from disclosure under the FOIA, and requests for information about oneself will be dealt with under the DPA.

#### **Code of Practice on Access to Government Information (COPAGI)**

COPAGI was introduced in 1994 and revised in 1997. COPAGI is non-statutory and applies only to government departments. In a number of ways COPAGI is the forerunner to the FOIA in that many of its requirements and exemptions are the same. The Cabinet Office already receives 20-25 COPAGI requests a year. Under the FOIA, however, there will be more public awareness and tougher rules and penalties. FOIA is also broader in scope: all written requests for information will continue to be dealt with under the provisions of COPAGI until the FOIA access rights replace it in 2005. Compliance with COPAGI is monitored by the Parliamentary Ombudsman, who makes an annual report to Parliament and has recently been critical of Whitehall's application of COPAGI.

#### **Environmental Information Regulations (EIRs)**

The EIRs were introduced in 1992 and amended and strengthened EIRs will come into force in January 2005. Like FOIA they give access rights to any person of any nationality, but they refer specifically to information about the environment. EIRs define environmental information very broadly, covering anything from water pollution statistics to details of the health and safety policies in a department. EIR requests do not have to quote the regulations and must be answered within two months (this will change to 20 working days when the amendments come into effect). Certain exemptions do apply but so too does the public interest test. To date the Cabinet Office, at least centrally, has not received any requests under the current EIR regime.

### **European Union (EU) Regulations**

The EU Regulations have been in effect since 2001. They apply to any citizen or registered resident of the EU and grant access to documents created by the European Council, Parliament and Commission. Some exceptions to disclosure do apply. If a request is received that should be handled under the EU Regulations it can either be dealt with in consultation with the relevant EU institution or referred to them in its entirety. Documents cannot be disclosed without the agreement of the EU institution, and applications must be answered within 15 working days.

### **Official Secrets Act (OSA)**

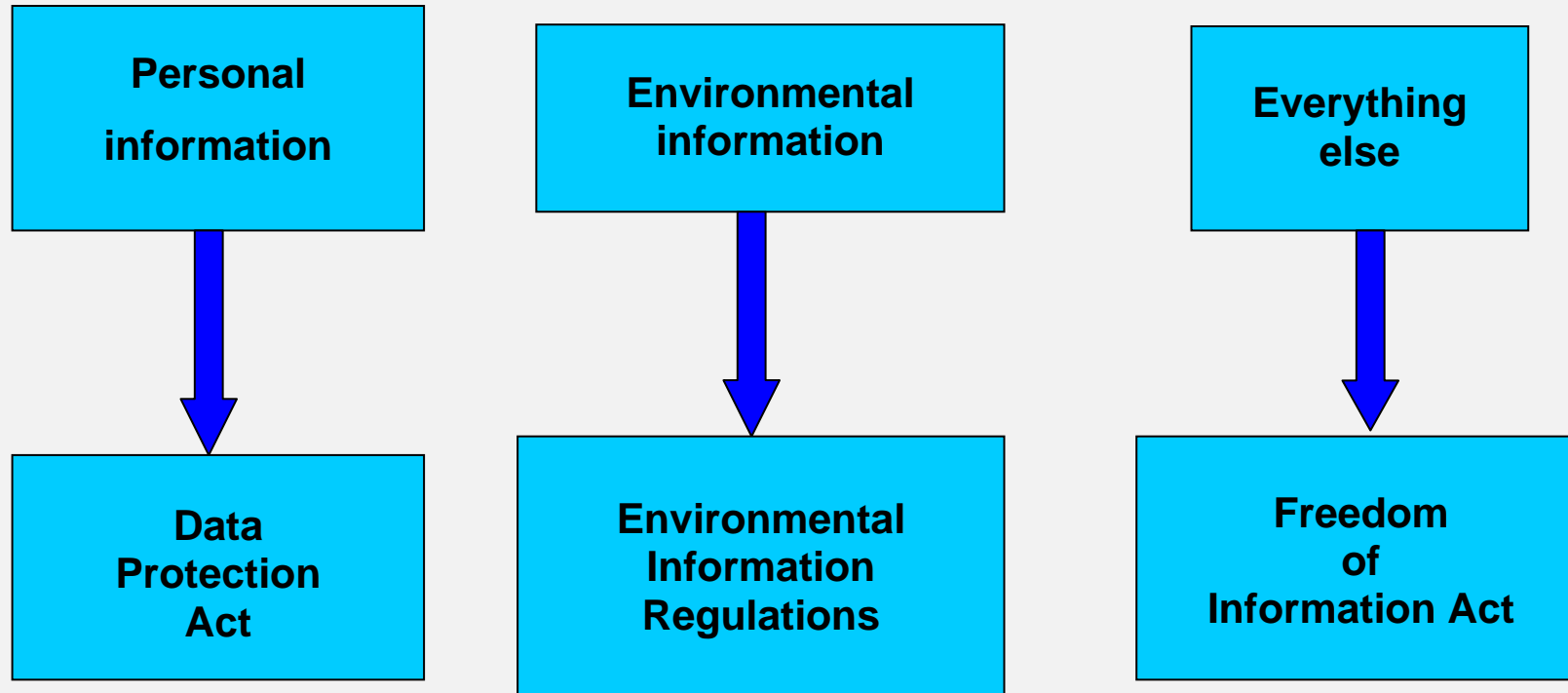
The OSA applies to all Cabinet Office staff. It prescribes penalties for the unauthorised disclosure of information. This obligation of secrecy does not conflict with FOIA since disclosure should always be properly authorised.

### **Public Records Acts 1958 and 1967**

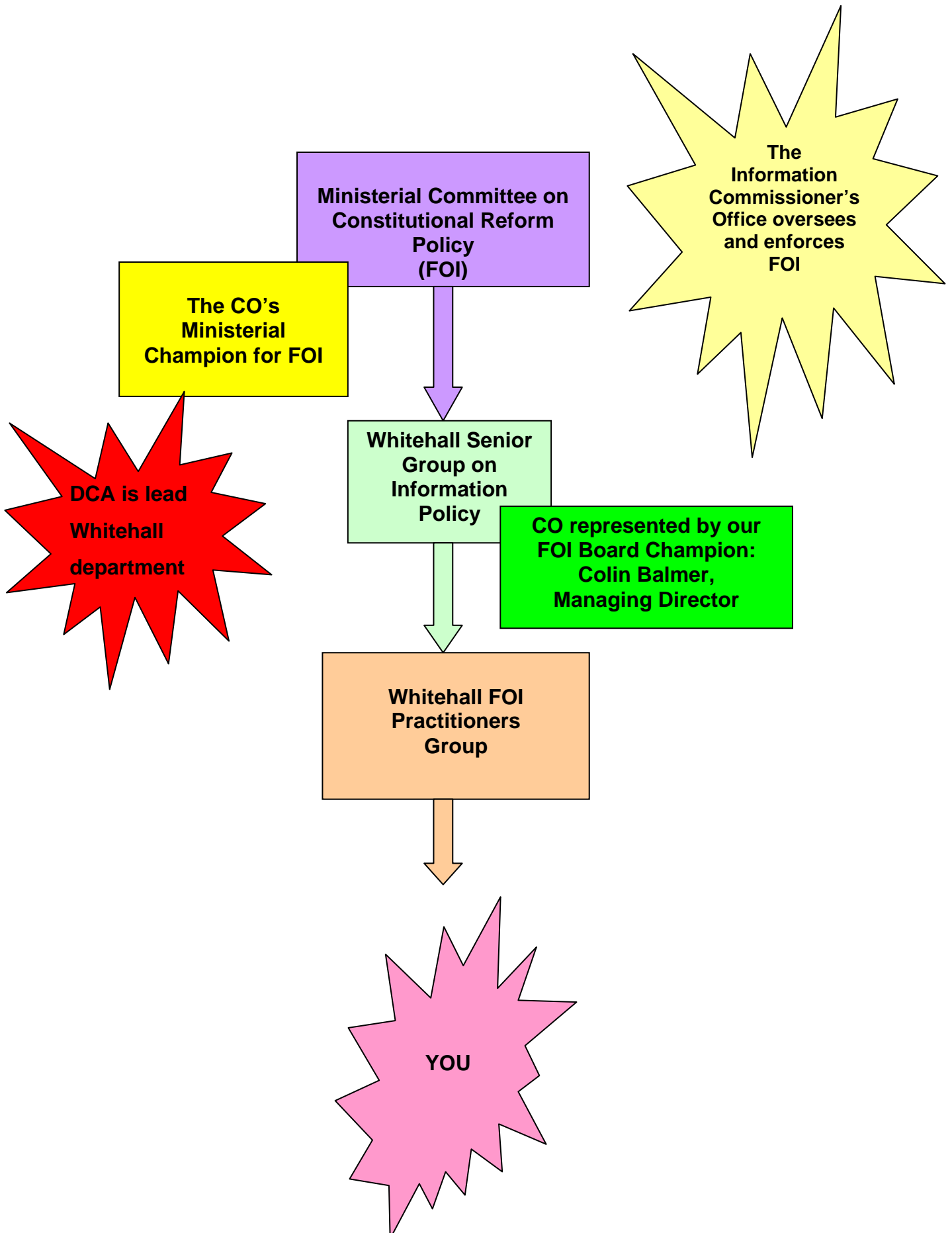
The Cabinet Office currently operates a devolved paper registry system. Local registries are responsible for their current files until after they have been closed for about five years and have been through initial review process to determine whether they need to be destroyed (as being of no further business or historic use) or kept for a longer period, in which case they transfer into the keeping of the Records Management Team of Histories, Openness and Records Unit. Those records that survive to 30 years (less that 10% of the total) are transferred to The National Archive for public use. FOIA can be applied in respect of any of this information at any stage of its life cycle.

## 4. Which access regime ?

There are **three** ways to access information. When you receive a request you may have to decide which access regime applies.



## 5. Who is responsible for FOI?



## 6. ACCESS RIGHTS UNDER THE FOIA

The right to information is enshrined in Part 1, Section 1 of the FOIA.:

‘Any person making a request for information to a public authority is entitled –

- (a) To be informed in writing by the public authority whether it holds the information of the description specified in the request: and
- (b) if that is the case, to have that information communicated to him

### What is an FOIA request?

The terms of the FOIA are broad. Every written request for information should be treated as an FOIA request, even if the FOIA is not mentioned. This does not mean that a draft answer to a Parliamentary Question or a reply to an e-mail requesting a leaflet will necessarily refer to the FOIA. It does, however, mean that the principles of the FOIA should be applied to every written request for information. This will not make much of a difference when requests are granted - but it could change the way that refusals are dealt with.

When a request is refused for access to information held by the Cabinet Office - including those from Members of Parliament, the media and the public - the relevant exemption (or exemptions) must be cited. A list of the FOIA exemptions is at the back of this booklet. Where appropriate it will also be necessary to explain why the public interest favours the use of the exemption rather than disclosure.

Requests for information made over the telephone are **not** FOIA requests, even if the FOIA is quoted. This distinction is that unless a request is made in a permanent format (i.e. in writing, including by e-mail) neither the Cabinet Office nor the applicant can refer back and ensure the answer fits the initial request. There is an obligation - both legal and professional - to be helpful and ask applicants to make requests in writing.



In addition to routine requests for information, the FOIA promotes wider access to government information. If requests are too large or too vague the applicant can be asked to be more specific, but all applications must be considered. The Cabinet Office cannot avoid disclosure without seriously assessing the material requested against the principles of the FOIA. A step-by-step guide to answering a request can be found at the 'Handling a Request for Information' section below.

It is not possible to say how many requests for information the FOIA will generate. Experience overseas suggests that the majority of requests will come from either the media or business. The Office of the Information Commissioner (OIC) will be mounting a publicity campaign encouraging applicants. There will be extensive media coverage of the introduction of the new access rights and it can be expected that the media will be significant users of the FOIA.

There is also a growing private sector interest in exploiting opportunities offered by the FOIA, including consultants and lawyers setting themselves up to use access rights on behalf of others. FOIA regimes are increasingly the international norm and the volume of requests from overseas media, and those with a case to press may well be considerable. The Hutton Inquiry has generated considerable public debate on access to information.

### **Type of information that can be requested under the FOIA**

Heads of Management Units will want to pay close attention to FOIA requests affecting their area of work, especially in the early months after the introduction of access rights. Information disclosed may well end up in the media. Individuals or groups denied information in the past or pursuing a particular issue or campaign may seek to make use of the FOIA. The refusal

of information can be a story in itself, particularly if the FOIA requirements are not scrupulously followed, and some requests are likely to be made simply to test the Cabinet Office's response. Round-robin requests could also expose any differing interpretations of the FOIA across Whitehall. Consistency will be important, and this will be helped by cross-Whitehall guidance from the Department for Constitutional Affairs.

Any information that the Cabinet Office holds in permanent format can be the subject of a FOIA request, except where the information constitutes personal data which can only be disclosed to the data subject under the DPA. An e-mail written yesterday and something that was written years ago may both be disclosed today. Applications can be made for any information we hold, even that received from other governments.

The fact that the FOIA covers all information held by the Cabinet Office does not mean that it is necessary to keep everything. Records management policies and procedures should continue to be applied as normal, including the regular cycles of the reviewing process and the adherence to local retention and disposal schedules. From January 2005, however, it will be a criminal offence to destroy material because it has been requested under the FOIA or DPA.

### **Exemptions to disclosure**

The FOIA contains a number of exemptions from disclosure, but these cannot be applied lightly. Nor can we use the protective marking of a document as a reason for non-disclosure. Protective markings such as 'Secret' or 'Top Secret', particularly of a recent document, may give a strong indication that an exemption could apply, but a protective marking of itself does not provide automatic exemption and the disclosability of the document must be considered. Each piece of information within a document must be assessed. All decisions to refuse information are potentially open to the scrutiny and challenge of the Information Commissioner.

## **Public interest test**

Information covered by certain exemptions must still be released if the public interest in releasing the information outweighs the public interest in withholding it. The Information Commissioner has suggested some criteria that would tend towards disclosure if disclosure would:

- contribute to public understanding of issues of the day;
- enhance the accountability and transparency of public bodies and of public spending;
- help people to understand decisions affecting their lives; and
- contribute to public safety.

This is not an exhaustive list and the circumstances of the case must be considered whenever the test is applied. It is not enough to just apply the test, we must be able to show that we have applied it.

## **7. HANDLING A REQUEST FOR INFORMATION**

**The FOIA is about promoting wider access to government information. The legal obligation is to provide applicants with a reply within 20 working days. Mistakes could be damaging to the Cabinet Office's corporate reputation. The following sets out the process of handling an FOIA request, a request for a review and a complaint to the Information Commissioner. The basic message is: if in doubt seek the Openness Team's advice.**

### **Access regime to be applied**

When a request is received it is necessary to decide whether it is a FOIA request, or whether it should be dealt with under other access regimes, and it needs to be remembered that requests do not have to quote the legislation. If a request mentions the wrong legislation it has to be considered under the correct regime.

### **Other areas that might have an interest**

If the information requested is in non-current files that are held by Histories, Openness and Records Unit, the request should be transferred to the Openness Team who will have access to Cabinet Office, archives. Similarly, if the information requested is held by a different part of the Cabinet Office the request should be passed to the area concerned. It is important that the lead area should have easy access to the majority of the relevant papers and be reasonably familiar with the material. If a request needs to be passed on, it is important to do so quickly - the deadline for reply is calculated from the date the request was received in any part of the Cabinet Office.

If the request covers material that the Cabinet Office does not hold, but another department does, the applicant should be informed and asked to transfer their request. This can only be done if the Cabinet Office does not have any relevant information at all. The Openness Team (see section 6) can provide details of the FOIA contacts in other departments.

### **Clarification**

If it is clear that it is a FOIA request it may be necessary to clarify the terms of the request. Although requests must be made in writing, it is perfectly acceptable, even recommended, to telephone the applicant to discuss their request. It is advisable to contact them quickly to ensure that it is understood what they require. If the initial request is impractical - it is too vague or too broad - the applicant should be advised at this stage so that the scope of the request can be refined. No attempt should be made to ascertain the reasoning behind the request - this is irrelevant and would provoke the censure of the OIC. Any changes or new information from this conversation should be recorded in writing.



### **Acknowledgement**

The receipt of a request must be acknowledged in writing, even if the applicant has already been contacted. The acknowledgement should quote the deadline, which in the case of the FOIA will be 20 working days from the date a request was received.

### **Recording of requests**

It is important to create an audit trail for all requests for information. Areas may wish to establish their own system. The Openness Team has provided a

template of the information that it is recommended should be recorded and is available on CabWeb. The DCA, the lead policy department, will be monitoring the number and handling of cases, so it is necessary to have an audit trail.

### **Round robins**

If it seems likely that the same request may also have been sent to other departments, the Openness Team should be contacted and they will be able to check with other departments. If a request is part of a round-robin campaign the Openness Team will provide advice.

### **Search process**

The information requested will have to be searched for before a decision is taken on whether or not it can be disclosed. Requests do not have to be particularly specific and it may be necessary to look in a variety of places. It will also be necessary to consider whether other areas of the Cabinet Office may hold relevant information and should be contacted. The FOIA covers all information whatever its age, protective marking, format, source or location. In answering a request it is necessary to look at every type of information from every source, including shared drives.

### **Collection and assessment of material**

Once the relevant material has been collected it must all be assessed for release in some cases line by line. This process may require consultation with other parts of the Cabinet Office and other departments. It should be remembered that any data on individuals contained within the material should not normally be disclosed.

### **Applying an exemption**

The starting point should be to consider what can be disclosed rather than to look for what cannot be disclosed i.e. exemptions should fit the material rather than fitting the material to the exemption. A decision on applying an

exemption should not be reached without examining the material in full. Even if a document cannot be released in its entirety there may be some parts that can and should be disclosed. Where management units are processing access requests where exemptions may be applied they should consult the Openness Unit.

### **Public interest test**

The majority of exemptions are subject to the public interest test, meaning that they can be discounted if the public interest will be best served by disclosing, not withholding the information. This test has to be applied every time an exemption that is not an absolute exemption is considered as part of the decision-making process. If an applicant disputes the decision to withhold information, the OIC will evaluate how well the test was applied.



### **Replying to the applicant**

If information is being withheld the exemption used must be quoted, and, where appropriate, an explanation of how the public interest test had been applied. When releasing only parts of a document this can be achieved by removing the exempt sections or by providing a set of the relevant extracts from the document. The information should, however, be clearly presented - and any acronyms explained - and the text should make sense even when exempt material has been removed.

The material being released may be subject to Crown Copyright and the applicant should be informed that making multiple copies or issuing the information to the public would infringe copyright. To do so they would require

a licence from HMSO ([www.hmso.gov.uk](http://www.hmso.gov.uk) HMSO Licensing Division, St Clements House, 2-16 Colegate, Norwich NR3 1BQ. Tel 01603 621 000).

Even where material is not being released it is usually necessary under the FOIA to confirm or deny that the Cabinet Office holds the information being requested.

A reply must also explain the complaints procedure. An applicant can request an internal review by the Cabinet Office which will be carried out by the Cabinet Office Managing Director. If an applicant remains unhappy with the response they can complain to the OIC. The Openness Team should be consulted before any reply is sent to an applicant refusing the disclosure of information in response to a FOIA request. The purpose is to ensure that the correct procedures have been followed and the review and complaints procedures have been properly explained.

### **Audit trail**

Copies should be kept of all of the information considered for release but not disclosed, along with the reasons for withholding it and the application of the public interest test. If there is a complaint, the OIC will want to see all the information relating to the handling of the request.



### **Publication scheme**

If it is found that the same piece of information is often being asked for, consideration should be given to putting it in the publication scheme. Applicants could then be directed to the relevant web site entry.

## **Internal reviews**

An internal review is likely to involve a full reconsideration of the handling of the case, as well as the final decision, by the Cabinet Office Managing Director.

## **Complaints**

Applicants can complain to the OIC if they remain dissatisfied after an internal review. If the OIC decides to investigate they can ask to see all the information related to the request, including information on how the request was handled, in order to carry out the investigation.

The OIC can overturn the refusal to meet a request by issuing an enforcement notice or a decision notice. The FOIA gives Cabinet Ministers the ability to veto these notices only if they concern the application of the public interest test. If the OIC overturns the use of an exemption, the Cabinet Office must comply with the notice or face being in contempt of court.

The Information Commissioner will make an annual report to Parliament on how well the various public bodies have applied the FOIA. Poor performance will generate a great deal of negative publicity for the Cabinet Office and be damaging to its corporate reputation.

## **Good practice**

The applicant should be kept informed throughout the process, especially if a reply will be late. The OIC will investigate the procedures as well as the response - even if the decision was correct the Cabinet Office could still be censured if the handling was poor.

Be as open as possible, be punctual with the response, be helpful, and involve the applicant if you can.

## 8. FURTHER INFORMATION AND CONTACT DETAILS

Copies of the FOIA, DPA and Code of Practice can be found on the Department for Constitutional Affairs web site ([www.dca.gov.uk](http://www.dca.gov.uk)).

More information about the development of the FOIA can be found on the web site of the Campaign for Freedom of Information ([www.cfoi.org.uk](http://www.cfoi.org.uk)). For insight into information access around the world visit [www.freedominfo.org](http://www.freedominfo.org).

For more information about the implementation of FOI in the Cabinet Office, guidance on responding to requests under FOIA, the Code of Practice or the DPA and general help with any open government legislation, please contact the Openness Team at [openness.team@cabinet-office.x.gsi.gov.uk](mailto:openness.team@cabinet-office.x.gsi.gov.uk).

## **9. QUESTIONS AND ANSWERS**

These questions and answers summarise the information given in more detail elsewhere in this guidance. They are intended as a quick reference guide.

### **Does the FOIA apply to the Cabinet Office?**

Yes. It applies to all of the organisations that make up the public sector. This includes Non-Departmental Public Bodies sponsored by the Cabinet Office that fall within the FOIA.

### **What are the main features of FOIA?**

The right of access to official information from 1 January 2005 (which is fully retrospective); publication schemes; and amendment of the access provisions of the Public Records Acts.

### **Who is likely to make a request for information?**

Although the UK FOIA is open to anyone of any nationality anywhere in the world, the experience of other countries with freedom of information legislation suggests that many requests are likely to come from the media and business. The FOIA is purpose-blind and all requests should be treated on an equal footing.

### **How much time do we have in which to reply?**

Every request for information must be answered within 20 working days. This means that everyone in the Cabinet Office must be able to recognise an FOIA request, get it to the right person quickly and deal with it expeditiously.

### **Who enforces the FOIA?**

The Office of the Information Commissioner. If the OIC finds that material has been incorrectly exempted from disclosure he can issue a decision notice in favour of release. The decision notice can only be overruled by a Cabinet Minister, which is only likely to happen in exceptional circumstances. Without the authority of a Cabinet Minister, failure to comply with a decision notice can cause the organisation to be treated as if it had committed contempt of court.

### **What about exemptions?**

The FOIA does provide exemptions to the disclosure of information. The exemptions are listed in Part II of the FOIA and at the end of this booklet. Eight of the exemptions are absolute, with the remainder being subject to the public interest test.

### **What is the public interest test?**

The public interest test means that information covered by certain exemptions must still be released unless it can be demonstrated that the public interest in withholding the information outweighs the public interest in disclosing it.

### **What about documents with a protective marking?**

A protective marking on a document does not exempt information from release, although it may indicate that one of the FOIA exemptions is likely to apply to at least some of the information.

### **What about the Official Secrets Act?**

The FOIA does not conflict with the OSA. Both Acts regulate the release of information: the OSA sets penalties for unauthorised disclosure, and the FOIA establishes authorised channels for disclosure. Information should never be supplied in response to a FOIA request without authorisation from the appropriate level.

### **What is the appropriate level for authorising release of information in the Cabinet Office?**

This will vary according to the circumstances of each management unit but we would advise that responses to FOI requests are signed off as for PQs. Remember, if in doubt or if an exemption is to be cited, contact the Openness Team.

### **What about the 30-year rule?**

The 30-year rule provides for the release of records to The National Archives after 30 years unless an exemption applies. This will not change under the FOIA. The only difference will be that some of the information will already have been released in response to FOIA requests.

### **Is this all new?**

Not really-The FOIA extends and formalises Existing requirements. The non-statutory Code of Practice On Access to Government Information has been in place Since 1994. The Code of Practice applies only to government Departments, but it does require the disclosure of information on request.

If information is withheld, including in response to Parliamentary Questions, the relevant Code of Practice exemption must be quoted. The exemptions are similar to those in the FOIA.

**Who can help me?**

The Openness Team in Histories, Openness and Records Unit will provide help and advice. E-mail: [openness.team@cabinet-office.x.gsi.gov.uk](mailto:openness.team@cabinet-office.x.gsi.gov.uk).

## FOIA EXEMPTIONS

Section	Exemption title	Status	Application
21	Information accessible to the applicant by other means	Absolute	Applies to all
22	Information intended for future publication	Public interest test	Applies to all
23	Information supplied by, or relating to, bodies dealing with security matters	Absolute	Applies to all
24	National security	Public interest test	Applies to all
26	Defence	Public interest test	Applies to all
27	International relations	Public interest test	Applies to all
28	Relations within the United Kingdom	Public interest test	Does not apply to Historical Records
29	The economy	Public interest test	Applies to all
30	Investigations and proceedings conducted by public authorities	Public interest test	Does not apply to Historical Records (subsection 1 only)
31	Law enforcement	Public interest test	Applies to all (except records 100 years old)
32	Court records etc	Absolute	Does not apply to Historical Records
33	Audit functions	Public interest test	Does not apply to Historical Records
34	Parliamentary privilege	Absolute	Applies to all
35	Formulation of government policy etc	Public interest test	Does not apply to Historical Records
36	Prejudice to the effective conduct of public affairs	Absolute, if referring to information held by the Commons or Lords	Does not apply to Historical Records
37	Communications with Her Majesty, and honours	Public interest test	Does not apply to Historical Records (sub-section 1a after 30 years, sub-section 1b after 60 years)
38	Health and safety	Public interest test	Applies to all
39	Environmental information	Public interest test	Applies to all
40	Personal information	Absolute, if referring to subsection (1) and (2)	Applies to all
41	Information provided in confidence	Absolute	Applies to all
42	Legal professional privilege	Public interest test	Does not apply to Historical Records
43	Commercial interests	Public interest test	Does not apply to Historical Records
44	Prohibitions on disclosure	Absolute	Applies to all

## Handling a request

APPENDIX B

Keep the applicant involved throughout - especially if your reply will be late

