

FREEDOM OF INFORMATION: POLICY AND REVISED GUIDE TO INFORMATION

1. The Freedom of Information Act 2000 (the Act) **requires** public authorities listed within a schedule to the Act, of which the Commission is one, to adopt and maintain a publication scheme that has been approved by the Information Commissioner's Office (ICO). Once the publication scheme has been adopted, the ICO **advises** public authorities to produce a Guide to information, which can be of varying forms. This is set out in more detail in paragraphs 6 to 10 below. The Secretariat has revisited the Commission's Guide to information, and FOI Policy statement, and seeks agreement from the Commission (subject to its view of the options referred to in paragraph 2) to the proposed Guide, at appendix A.

2. With the commencement of the 2013 Review, the Secretariat has also taken the opportunity to revisit the Commission's current approach to its information and, in doing so, propose some options for change to the Commission's approach to the publication of information. The Secretariat proposes some options for the Commission to take a view on, relating to its minutes and papers, in paragraphs 15 to 21 of this paper.

Context

3. The Commission has already noted that the 2013 Review will be undertaken under much higher levels of scrutiny than previous reviews. At the same time, since the last review, scrutiny of the public sector in general has led to public authorities taking a significantly more transparent approach to their information and its publication. Wider availability of internet access to the general public has allowed public authorities to publish information on their websites, thereby showing their commitment to the spirit of the legislation while, at the same time, mitigating against the bureaucracy involved in responding to requests for information.

4. Additionally, it has been suggested by some that the relevant provisions in the Act are sometimes used as a tactic to delay and disrupt public authorities. There is an argument that early release of all permissible information, again, mitigates against the disruption repeated requests create (though it should be noted that public authorities are permitted, under the Act, to not comply with vexatious or repeated requests).

5. It is in this context that the Secretariat has reviewed the Commission's approach to the publication of its information in general.

Freedom of Information Act 2000 and the ICO's guidance

6. Section 19 of the Act states that a public authority **must** adopt and maintain an approved publication scheme, publish information in accordance with that scheme, and from time to time review it. Section 20 of the Act permits the ICO to approve model publication schemes from time to time, and allows public authorities to adopt such a scheme without further recourse to the ICO for approval.

7. The ICO currently publishes an approved model publication scheme, which is to be adopted as it is; rather than be amended to reflect the public authority's approach to information. The model publication scheme (which is incorporated in appendix A to this paper) details seven classes of information to be made publicly available. These are:

- **Who we are and what we do** (organisational information, locations and contacts, constitutional and legal governance);
- **What we spend and how we spend it** (financial information relating to projected and actual income and expenditure, tendering, procurement and contracts);
- **What our priorities are and how we are doing them** (strategy and performance information, plans, assessments, inspections and reviews);
- **How we make decisions** (policy proposals and decisions; decision making processes, internal criteria and procedures, consultations);
- **Our policies and procedures** (current written protocols for delivering our functions and responsibilities);
- **Lists and registers** (information held in registers required by law and other lists and registers relating to the functions of the authority); and
- **The services we offer** (advice and guidance, booklets and leaflets, transactions and media releases).

8. The ICO also publishes guidance (a 'definition document') for non-departmental public bodies (NDPBs) such as the Commission, that details what it would expect such bodies to provide in order to meet their commitments under the publication scheme.

9. The ICO's guidance **advises** that NDPBs, having considered and adopted the model publication scheme, should prepare a Guide to information – as the Commission currently has – that should detail what information the authority publishes and where it is accessible. The Guide to information is intended to show where and how the public authority makes information available, rather than be the resource through which information is made available. There is no recommended template or form for this Guide to take.

10. It should be noted that the ICO states that, for many authorities, their website and the publication of information on it may provide a comprehensive guide to information. However, there is no structure recommended for such websites. Given that, at the time of writing, the Commission's new website is not fully constructed (though will be by 1 April 2011) and, in keeping with the Commission's policy of being able to cater for people who do not have access to the internet, the Secretariat does not recommend relying on the website as the only Guide to information; but also making available such a document in paper form. This is also incorporated in appendix A to this paper.

The information we publish

11. The ICO's guidance states clearly that NDPBs should make available any information held that falls within the seven definitions above **unless**:

- The information is exempt under one of the Act's exemption or is prohibited by another statute;
- The information is archived, out-of-date, or otherwise inaccessible;
- It would be impractical or resource-intensive to prepare the material for routine release.

12. The exemptions with the Act are detailed in Part 2 of the Act and, in relation to the Commission, include:

- Information accessible to the applicant by other means (section 21);
- Information intended for future publication (s.22);
- Information relating to the formulation of government¹ policy (s.35);
- Information that, if released, would prejudice the conduct of public affairs (s.36);
- Information that constitutes personal data (s.40);
- Information provided in confidence (s.41); and
- Information that is covered by legal privilege (s.42).

13. The Commission's approach thus far has been to make available much of the information covered within the seven definitions (above) through either the website, in its Guide to information or on demand in hard copy form. It should be noted that many of the suggested pieces of information either do not relate to or are not held by the Commission (matters pertaining to corporate bodies such as capital programmes or employment policies, that would be held by the Commission's sponsoring department).

14. The Secretariat recommends continuing with this open and transparent approach, while additionally making use of the Commission's new website, which, being managed by the Communications Manager, will allow greater flexibility for the Commission to publish information at greater speed. Appendix B to this paper shows the ICO's guidance on what NDPBs should make available, and details through which medium the Secretariat proposes the information should be made available (subject to the Commission's decision on the options laid out below).

Commission meeting minutes and papers

15. The Commission's current approach is to publish minutes for Commission meetings only at the end of a review, rather than once the minutes have been formally approved. Agendas and papers are not currently published, but are not viewed as exempt from publication. In practice, the minutes of the last review are available on demand from the Commission or from the National Archives. Minutes of Commission meetings since the last review are not available on the website, but are available on request from the Commission. The ICO's guidance to NDPBs states that it expects minutes and papers of senior and board meetings to be readily available to the public.

16. It might be useful to consider the two types of information that are generally contained in a set of the Commission's minutes – that relating to the deliberation of and decisions on a set of boundaries; and that relating to the effective governance of both the process of the review, and of the organisation as a whole (non-boundary-related matters). As mentioned previously, the Commission is committed to openness and transparency in the way it conducts its work. The question therefore arises as to whether its commitment to openness and transparency is reflected in the way in which it records its deliberation and decision-making processes in full and thorough initial proposals and final recommendations reports,

¹ Section 84 of the Act defines government department (to which this exemption relates) as, among other things: 'any [...] body or authority exercising statutory functions on behalf of the crown' and therefore this exemption can be applied to the Commission and its formulation of policies.

and whether it is necessary, or in the public interest, to publish minutes of non-boundary-related matters during the course of any review.

17. There is inherent risk in the Commission routinely publishing minutes of non-boundary-related matters, in that it could provoke further opportunity for the challenging of (non-boundary-related) decisions taken and hence cause unnecessary disruption to the Secretariat's key business of conducting the review. Equally, in the case where it was judged that much of the non-boundary-related business was exempt from publication, publishing minutes with the majority, or a significant part, redacted might lead to further criticism, or further enquiries as to the content of the redacted material.

18. However, it could be argued that this approach is open to criticism for not being transparent, nor being within the spirit of the legislation. It carries both legal and reputational risk, and does not compare favourably with many other public authorities. Arguably, it also invites requests for such information, creating further unnecessary work for the Secretariat in dealing with such requests. While such requests have not been made frequently – if at all – the likelihood of people wanting to gain access to these documents throughout the period of the 2013 Review must be higher, given the controversial nature of the passage of the enabling legislation for the review, and the expected levels of scrutiny during the review.

19. The Secretariat has also considered whether the Commission should publish all papers put to the Commission. Arguments for and against the routine release of such papers can be made on the same lines as those relating to the publication of the minutes, as above.

20. By way of comparison, the Welsh and Northern Ireland Commissions do not have minutes, papers or agendas on their websites, nor is there any commitment to their publication within those commissions' publication schemes. The Scottish Commission has published its minutes and papers up to April 2010. These documents contain both boundary-related and non-boundary-related material. The Scottish Commission's Guide to information states that the minutes, papers and agendas 'will only be published once the proposals or report to which they relate have been published'.

21. The Local Government Boundary Commission for England publishes its minutes once they have been approved, subject to exempt material being redacted. The LGBC for Wales also publishes its minutes (the latest being from August 2010) but does not have a stated policy on the timing of their publication. LGBC for Scotland has minutes and papers on its website, and its publication scheme commits it to publishing them within three months of the meeting taking place.

22. Having considered the factors above, the Secretariat therefore outlines two options relating to the publication of minutes.

- **Option 1:** The Commission continues with its current approach of routinely publishing minutes only at the end of the review to which they pertain. This would reduce the risk of challenge to non-boundary-related decisions. To mitigate against possible criticism, the Commission would need to prepare a strong line of justification for such routine non-publication. The Commission would have to take a view on minutes of meetings between reviews – though it may be sensible to return to this issue once the 2013 Review is complete – and also any ad-hoc requests for minutes.

- **Option 2:** The Commission publishes the minutes of their meetings once they have been formally approved. Inevitably, there will be certain items within each set of minutes which will be judged to be exempt from publication, either for a temporary period (such as the deliberation on the initial proposals prior to their publication) or permanently (such as discussions protected under legal privilege). In such cases, the relevant minute would be redacted and an explanation of the redaction would be included. The remainder of the minutes could then be published without redaction.

23. The Commission is invited to take a view on these options. The Guide to information at Appendix A would be updated as appropriate.

Internal handling

24. The Commission's support team has thus far dealt with FOI requests, and will continue to do so, being supported by the Review Co-ordinators. FOI responses will go from the Secretary, and will be published on the website, to further underline transparency and to reduce the risk of repeated requests. The Commission will continue to be responsible for its own FOI requests, being a named public authority in the Act, rather than adhering its sponsoring department's policies and procedures on information. The sponsor department will continue to be consulted on any request that concerns correspondence between it and the Commission.

Recommendations

25. Attached at Appendix A is the Secretariat's recommended FOI policy. This includes an introductory policy section; followed by the ICO's model publication scheme; concluding with the Commission's revised Guide to information. This document will be on the website and available in hard copy. Appendix B is intended to show Commissioners, in more detail, the publications or media through which all information recommended by the ICO is available. The Secretariat recommends to the Commission that it adopt the policies laid out in this paper, and the accompanying appendices, subject to its views on the publication of its minutes.



Freedom of Information Policy and Publication Scheme

Introduction

1. The Boundary Commission for England (the Commission) is committed to the provisions and principles of the Freedom of Information Act 2000 (FOIA). The FOIA is regulated by the Information Commissioner's Office (ICO) and further details can be accessed via their website: www.ico.gov.uk.
2. The Commission has adopted the Information Commissioner's FOIA **Model Publication Scheme** for public sector organisations, which can be found at Annex A.
3. The Commission seeks to proactively and routinely publish all relevant information specified within the publication scheme. The **Guide to Information** at Annex B provides details of how that information may be accessed.

Obtaining and locating information

4. While much of the information detailed below is primarily available via our website, the Commission can provide many documents in alternative formats on request. Please contact the Commission Secretariat to discuss your requirements: foi@bcommengland.x.gsi.gov.uk
5. Information not referenced in the following document can be requested by contacting the Commission Secretariat: foi@bcommengland.x.gsi.gov.uk

Copyright

6. All Commission publications are subject to Crown Copyright. Material may be reproduced for personal or in-house use without formal permission or charge. Reproduction for sale or other commercial purposes is not permitted. Further information, including guidance notes on publishing and copyright, is available from The Stationery Office: www.tsoshop.co.uk

7. The outline maps used in Commission documents are based on Ordnance Survey data and are subject to Crown Copyright. Any person wishing to reproduce the outline maps should first contact Ordnance Survey: www.ordnancesurvey.co.uk

Charging policy

8. The published reports of the Commission's reviews are available for purchase from The Stationery Shop (TSO). Single copies of other publications are available free of charge, though the Commission may wish to recover copying, postage and packaging costs where requests are made for a large number of publications.

Feedback, questions and further information

9. It is important that the Commission's Freedom of Information policy meets your needs. Any suggestions for additional classes of information which might be included in future, or how information might be made more accessible, would be welcomed.
10. Any questions or comments about this policy should be sent to the Commission's Freedom of Information Officer at foi@bcommengland.x.gsi.gov.uk

Complaints about this policy

11. Complaints regarding this policy or the provision of information should be made in the first instance to the Secretary to the Commission.
12. If you are unhappy with our response to your request, you can ask that the Commission review it internally. If you remain unsatisfied, you can appeal to the Information Commissioner:

The Information Commissioner
Cheshire
SK9 5AF
Tel 01625 545 745
Email mail@ico.gsi.gov.uk

Model Publication Scheme

This model publication scheme has been prepared and approved by the Information Commissioner. It may be adopted without modification by any public authority without further approval and will be valid until further notice.

This publication scheme commits an authority to make information available to the public as part of its normal business activities. The information covered is included in the classes of information mentioned below, where this information is held by the authority. Additional assistance is provided to the definition of these classes in sector specific guidance manuals issued by the Information Commissioner.

The scheme commits an authority:

- To proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the authority and falls within the classifications below.
- To specify the information which is held by the authority and falls within the classifications below.
- To proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
- To produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- To review and update on a regular basis the information the authority makes available under this scheme.
- To produce a schedule of any fees charged for access to information which is made proactively available.
- To make this publication scheme available to the public.

Classes of Information

Who we are and what we do.

- Organisational information, locations and contacts, constitutional and legal governance.

What we spend and how we spend it.

- Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.

What our priorities are and how we are doing.

- Strategy and performance information, plans, assessments, inspections and reviews.

How we make decisions.

- Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.

Our policies and procedures.

- Current written protocols for delivering our functions and responsibilities.

Lists and Registers.

- Information held in registers required by law and other lists and registers relating to the functions of the authority.

The Services we Offer.

- Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

The classes of information will not generally include:

- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure.
- Information in draft form.
- Information that is no longer readily available as it is contained in files that have been placed in archive storage, or is difficult to access for similar reasons.

The method by which information published under this scheme will be made available

The authority will indicate clearly to the public what information is covered by this scheme and how it can be obtained.

Where it is within the capability of a public authority, information will be provided on a website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, a public authority will indicate how information can be obtained by other means and provide it by those means.

In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.

Information will be provided in the language in which it is held or in such other language that is legally required. Where an authority is legally required to translate any information, it will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this scheme.

Charges which may be made for Information published under this scheme

The purpose of this scheme is to make the maximum amount of information readily available at minimum inconvenience and cost to the public. Charges made by the authority for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on a website will be provided free of charge. Charges may be made for information subject to a charging regime specified by Parliament.

Charges may be made for actual disbursements incurred such as:

- photocopying
- postage and packaging
- the costs directly incurred as a result of viewing information

Charges may also be made for information provided under this scheme where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.

Written Requests

Information held by a public authority that is not published under this scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act.

Who we are and what we do

Organisational information, locations and contacts, constitutional and legal governance

1. Details of the roles and responsibilities of the Commission, including information relating to the legislative basis of our duties and our organisational structure, are available at the 'about us' section of the website:
www.boundarycommissionforengland.org.uk/aboutus
2. The text of the Parliamentary Constituencies Act 1986 as amended by the Boundary Commissions Act 1992 and, more recently, the Parliamentary Voting System and Constituencies Act 2011 can be found via the following link: (xxxxxx)
3. Details of the location of the Secretariat and how they can be contacted are available in the 'contact us' section of the website:
www.boundarycommissionforengland.org.uk/contactus
4. Additionally, links to the other boundary commissions within the UK can be found at the website home page: www.boundarycommissionforengland.org.uk

What we spend and how we spend it

Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts

1. Budget and expenditure information for the Commission, including Member and staff allowances and expenses, is available in the **Annual Reports** which can be accessed via the following link:
www.boundarycommissionforengland.org.uk/annual-reports

What are our priorities and how are we doing

Strategy and performance information, plans, assessments, inspections and reviews

1. Information regarding the Commission's strategy and performance are available in the **Annual Report**: www.boundarycommissionforengland.org.uk/annual-reports
2. The Commission's constituency **Review Reports** to Parliament are available via the following website link www.boundarycommissionforengland.org.uk/reviews and are also published by The Stationery Office (TSO).

3. The **electoral statistics** relating to the current review of parliamentary constituencies are available via the following website link:

www.boundarycommissionforengland.org.uk/electoral-figures

How we make decisions

Decision making processes and records of decisions

1. Information and documentation relating to the Commission's current review of parliamentary constituencies can be accessed via the following link: www.boundarycommissionforengland.org.uk/consultation. Additionally, this information will be made available at local places of deposit.
2. **Minutes, agendas and papers of the Commission's meetings** are available via the following link: www.boundarycommissionforengland.org.uk/commission-meeting-documents. Those meeting documents that relate to the Commission's decision making will only be published once the proposals or report to which they relate have been published.

Policies and procedures

Current written protocols for delivering our functions and responsibilities

1. The Commission maintains a **Code of Practice for Commissioners** and a **Code of Practice on Written Consultation**, both of which can be accessed via the 'publications' section of the website: www.boundarycommissionforengland.org.uk
2. Details regarding the Commission's records management and personal data policies and procedures are available at the 'about us' section of the website: www.boundarycommisisonforengland.org.uk/aboutus

Lists and registers

Information held in registers required by law and other lists and registers relating to the functions of the authority

1. The Commission maintains a **Register of Interests for Commissioners** which can be accessed via the 'about us': www.boundarycommissionforengland.org.uk

2. The Commission's **Disclosure Log**, which details all information released under the Freedom of Information Act to date, is available in the 'Freedom of Information' section of the website: www.boundarycommissionforengland.org.uk/foi

The services we offer

Advice and guidance, booklets and leaflets, transaction and media releases

1. In addition to the above information, the Commission makes a number of guidance and information documents available.
2. **Newsletters** and **News Releases** providing an update on the progress of the Commission's review can be accessed at the website homepage: www.boundarycommissionforengland.org.uk
3. An **Information Booklet** providing information on the context and programme for the review can be accessed via the 'publications' section of the website: www.boundarycommissionforengland.org.uk/publications
4. The Commission passes its archived material to the National Archives.

Appendix B: proposed adherence to the ICO's guidance for NDPBs

ICO Guidance on information to publish	Formal publication	Separately on website	Hard copy/email on demand only	Comments/identify publication
Who we are and what we do:				
<ul style="list-style-type: none"> • Roles and responsibilities of organisation 	✓	✓		Available in <i>Information booklet</i> and on website
<ul style="list-style-type: none"> • Roles and responsibilities of those working within the organisation at a senior level 		✓		Available on website
<ul style="list-style-type: none"> • Organisational structure 		✓		Document on website
<ul style="list-style-type: none"> • Information relating to legislative basis of duties 	✓	✓		Will be available in <i>Information Booklet</i> and on website
<ul style="list-style-type: none"> • Information relating to organisations with which the NDPB works in partnership 	✓	✓		Links to other Boundary Commissions (including LGBCE) and Electoral Commission on website. Sponsoring department identified in <i>Annual Report</i>
<ul style="list-style-type: none"> • Identification of, responsibilities of, and biographical details of those making strategic and operational decisions 		✓		Identification of senior staff and Commission members, and biographical details of Commissioners available on website
<ul style="list-style-type: none"> • Location and contact details 	✓	✓		Available on website and all printed documents
What we spend and how we spend it:				
<ul style="list-style-type: none"> • Financial statements, 	✓			Available in <i>Annual Report</i>

ICO Guidance on information to publish	Formal publication	Separately on website	Hard copy/email on demand only	Comments/identify publication
budgets and variance reports				
• Capital programme				The Commission does not have a Capital programme
• Board members' allowances and expenses	✓	✓		Commissioners' expenses allowance included on website; T&S total included in <i>Annual Report</i>
• Procurement and tendering procedures			✓	The Commission does not have its own policies. These are owned and managed by its sponsoring department
• List of contracts awarded and their value			✓	The Commission has an SLA with Ordnance Survey; the Commission's sponsoring department holds other contracts on its behalf
• Financial statements for projects and events	✓			Contained in <i>Annual Report</i>
• Internal financial regulations	n/a			Not applicable to the Commission

ICO Guidance on information to publish	Formal publication	Separately on website	Hard copy/email on demand only	Comments
What are our priorities and how are we doing:				
• Strategic plans	✓			Available in the <i>Annual Report</i>
• Annual business plan	✓			Available in the <i>Annual Report</i>
• Annual report	✓			
• Internal and external performance reviews	n/a			Not applicable to the Commission
• Reports to parliaments	✓			Accessible through website or TSO
• Inspection reports	n/a			Not applicable to the Commission
• Service standards	n/a			Not applicable to the Commission
• Statistics produced in accordance with the NDPB's requirements		✓		2011 electoral statistics available on the website
• Public service agreements			✓	The Commission is signatory to the Pan Government Agreement for mapping data

ICO Guidance on information to publish	Formal publication	Separately on website	Hard copy/email on demand only	Comments
How we make decisions:				
• Major policy proposals and decisions	✓	✓		Will be available in the <i>Information Booklet</i>
• Background information to major policy proposals and decisions	✓	✓		Will be available in the <i>Information Booklet</i>
• Public consultations	✓	✓		Consultation documents, hearing transcripts and responses will be on website during and after consultation periods and consultation documents will be available at places of deposit around the country
• Minutes of senior level meetings		✓		Publication of minutes, subject to redaction for exempt material ¹
• Reports and papers provided for consideration at senior level meetings			✓	Because of detail in minutes, publication on web of papers would be unnecessary and arguably obfuscatory. On demand only, subject to any exemptions ²
• Internal communications guidance and criteria used for decision making	✓			Will be available in the <i>Information Booklet</i>

¹ Timing of release subject to Commission's decision on 4 April 2011

² Subject to confirmation by Commission on 4 April 2011

ICO Guidance on information to publish	Formal publication	Separately on website	Hard copy/email on demand only	Comments
Policies and procedures:				
<ul style="list-style-type: none"> • Conduct of departmental business 		✓		Most policies are those of the sponsoring department. Those that do or will exist, such as the Code of Conduct, Code of Practice on Written Consultation, FOI policy and Guide to Information, Data Protection and Equalities policies, are or will be on the website
<ul style="list-style-type: none"> • Provision of services 	✓			Available in the <i>Information booklet</i>
<ul style="list-style-type: none"> • Recruitment and employment of staff 			✓	Policies are those of the sponsoring department
<ul style="list-style-type: none"> • Customer service (plus complaint procedure) 	✓			Complaints procedure in <i>FOI policy and Guide to Information</i> and on website
<ul style="list-style-type: none"> • Records management and personal data policies 	✓			Available in <i>FOI policy and Guide to Information</i>
<ul style="list-style-type: none"> • Charging regime and policies 	✓			Available in <i>FOI policy and Guide to Information</i>

ICO Guidance on information to publish	Formal publication	Separately on website	Hard copy/email on demand only	Comments
Lists and registers:				
<ul style="list-style-type: none"> Public registers and registers held as public records 	n/a			The Commission holds electoral registers which are protected under the Data Protection Act and exempt from release
<ul style="list-style-type: none"> Asset registers and Information Asset Register 	n/a			The Commission does not have its own asset register; assets are owned by the sponsoring department
<ul style="list-style-type: none"> Disclosure logs 		✓		Available on the website, with links to responses
<ul style="list-style-type: none"> Register of gifts and hospitality to Board members and senior personnel 		✓		Available on website
<ul style="list-style-type: none"> Any register of interests kept in the department 		✓		Available on website
<ul style="list-style-type: none"> Other lists required by law 	n/a			

ICO Guidance on information to publish	Formal publication	Separately on website	Hard copy/email on demand only	Comments
The services we offer:				
• Regulatory responsibilities	n/a			Not applicable to the Commission
• Services for public authorities / industry / other organisations / members of the public	✓	✓		Consultation and information documents available on the website and in hard copy at places of deposit
• Services for which the NDPB is entitled to recover a fee and details of the fees	n/a			
• Leaflets , booklets and newsletters	✓	✓		All available on the website
• Advice and guidance	✓	✓		Already available in the <i>Newsletter</i> and will be available in the <i>Information booklet</i>
• Media releases		✓		Available on the website