Dear [Name],

1. Thank you for your email of 15 December 2011 in which you requested a copy of the 'comprehensive review', referred to in the 12 December press release, 'MOD standardises accommodation and domestic support for senior officers'. This has been considered as a request for information under the Freedom of Information Act (FOIA) 2000.

2. In our response to you on 16 January 2012, we stated that we believed that the report may contain information which fell within the scope of qualified exemptions under the FOIA. We therefore needed to decide whether the public interest in maintaining the exemptions outweighed the public interest in disclosure. We were also required to consult with a number of external and foreign organisations. I can confirm that we have now completed this process.

3. A copy of the 'comprehensive review' you requested is therefore enclosed. However, some of the information contained within it was exempt under, section 24 (national security), section 26 (Defence), section 27 (international relations), section 38 (health and safety), section 40 (personal data) and section 41 (breach of confidence) of the Freedom of Information Act. This information has therefore been withheld.

4. Under Section 16 of the Act we are required to provide advice and assistance, so far as it would be reasonable to do so. In addition to the information I have provided therefore, it may be interesting to note that following the review in 2010 the MOD has implemented a number of recommendations with policy changes to entitlements for senior officers. The MOD is committed to promoting Value for Money across the department in order to maximise the resources available for operations. Significant savings have already been achieved with a reduction in the entitlements senior officers now receive.

- In early 2011 we implemented a new model for outer office support which is expected to reduce costs by around £29m.

- We have revised our policy on official hospitality given to senior officers, the changes introduced will save £2.5m a year.
We have discontinued the provision of Official Service Residences saving at least another £3m a year.

1st Class travel has been banned for civilian and military staff, and the criteria for using business class tickets has been tightened up, in total this has saved £19.4m last year alone.

We are also conducting a supplementary review of departmental policy on the provision of staff cars, taking into account of the need to demonstrate VFM and provide maximum flexibility.

We have also decided that once the current Service Chiefs of Staff leave their posts and Commander-in-Chief posts are disestablished, further moves will be made to accommodation for senior officers. This will see the release of Bulford Manor in Wiltshire, an apartment at Kensington Palace and Admiralty House in Northwood, while the Chief of the Air staff will move from his residence in London to occupy the vacated Commander-in-Chief’s residence at High Wycombe. This will produce a total saving of around £202,000 a year.

Since 2010 Junior Defence Ministers have, in accordance with the new Ministerial Code, given up their cars with a dedicated driver to reduce costs and now share a central MOD car pool with senior military officers and officials working in the MOD Main Building. This has seen an annual saving of over £150,000 a year.

5. The measures already taken are expected to deliver savings of nearly £53m in the last year alone.

6. We are carrying out further work in other areas covered by the review with a view to implementing further changes which will lead to additional savings.

7. The summary of the Public Interest Test, by section of the FOI Act, is as follows:

Section 24 (i) (national security)
8. The report identifies details of the senior individuals who have used and continue to use the Communications Fleet. Although this would provide transparency on activity related to spending of public funds, its release could indicate to a potential enemy the location of key senior civilian and military personnel and could in turn, by virtue of their central importance to UK Defence, jeopardise security. Therefore, information that falls under this exemption as indicated in the document has been withheld as the public interest in withholding outweighs the public interest in disclosure.

Section 26 (i)(b) (defence)
9. The report comments on the operational effectiveness and availability of the Communications Fleet. Information identifying the role of the fixed wing assets is already in the public domain. However releasing information related to its availability and effectiveness could compromise the preparations for current and future operations by demonstrating the capability that we possess. The public interest test concluded that on balance it was not in the public interest to disclose this information.

Section 27 (i)(a) (international relations)
10. The report lists the financial costs of hosting a variety of high profile foreign dignitaries. The information can not be taken to infer UK Defence priorities and such details provide transparency on activity relating to the spending of public funds. Information of this type is increasingly in the public domain and therefore the report
discloses all the details for these foreign visits as it is assessed that the case for disclosing outweighs the public interest in withholding.

Section 37 (Royal Family)
11. A thorough examination of the report identified that there was no information that fell within this section of the FOI Act. The report does not reference communications with the Royal Family, and therefore Section 37 of the FOI Act did not apply.

Section 38 (i) (health and safety)
12. The report reveals the addresses for the Official Service Residences. Whilst revealing this information would provide transparency on public spending, these are still occupied and making known the addresses could jeopardise the security of the current occupant. Therefore whilst it is not in the public interest to disclose the addresses it is in the public interest to disclose the associated expenditure details and so this relevant information has been released.

Section 43 (2) (commercial interests)
13. The report contains calculated cost information for the provision of the Commercial Fleet. Such information has the potential to prejudice future contract negotiations. However it was assessed that the release of this costing information was in the public interest as it will help to make judgements on the value for money for providing this service. Therefore it was determined that the public interest to disclose outweighed the public interest to withhold.

14. Additionally, some of the withheld information is personal data relating to third parties. It is our view that disclosure of this information would breach the first data protection principle, which states that personal data should be processed fairly and lawfully. Section 40(2) and (3) of the FOIA therefore apply. It is the fairness aspect of this principle which we think would be breached by disclosure in this case. In such circumstances s.40 confers an absolute exemption on disclosure. There is, therefore no public interest test to apply.

15. Finally, information relating to section 41 (breach of confidence) is also classed as an absolute exemption and does not require a public interest test. Some information which was obtained in confidence has been withheld in line with this absolute exemption withheld.

16. If you are not satisfied with this response or you wish to complain about any aspect of the handling of your request, then you should contact me in the first instance. If informal resolution is not possible and you are still dissatisfied then you may apply for an independent internal review by contacting the Head of Corporate Information, 2nd Floor, MOD Main Building, Whitehall, SW1A 2HB (e-mail CIO-FOI-IR@mod.uk). Please note that any request for an internal review must be made within 40 working days of the date on which the attempt to reach informal resolution has come to an end.

17. If you remain dissatisfied following an internal review, you may take your complaint to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that the Information Commissioner will not investigate your case until the MOD internal review process has been completed. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website, http://www.ico.gov.uk.
Yours sincerely,

[signed on original]