



Dignity and Respect Policy

2 March 2023

Request for Information.

Thank you for your request received on 6 February in which you asked:

Under the Freedom of Information Act please disclose a report, produced last year for the Senedd commission, reviewing the Senedd's dignity and respect policy.

Please find our response below.

The dignity and respect policy is under review and is due to be published on the [Senedd website](#) later this year. The report will also be published at this time.

As it will be available at a future date, your request is subject to section 22 of the Freedom of Information Act 2000 (FOIA). This exempts information intended for future publication. Please see the [annex](#) for further information.

Yours sincerely

Buddug Saer
Freedom of Information Manager
Welsh Parliament

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Your request has been considered according to the principles set out in the **Code of Practice on Public Access to Information**. If you have any questions regarding this response please contact me. If you feel you have cause for complaint, please follow the guidance below.

Cause for concern or complaint with your FOI response?

If you are dissatisfied with the Welsh Parliament's handling of your request, you can request an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Freedom of Information Manager at:

Information-request@senedd.wales or in writing to

Welsh Parliament
Governance and Assurance
Cardiff Bay
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Annex

Section 22

Section 22 of FOIA provides that:

- (1) *Information is exempt information if-*
 - (a) *the information is held by the public authority with a view to its publication, by the authority or any other person, at some future date (whether determined or not),*
 - (b) *the information was already held with a view to such publication at the time when the request for information was made, and*
 - (c) *it is reasonable in all the circumstances that the information should be withheld from disclosure until the date referred to in paragraph (a).*

Section 22 is available if the public authority in question holds the requested information and intends for it to be published at some future date. However, in all the circumstances it must be reasonable to withhold the information until its planned publication.

We consider it reasonable to withhold the information requested at this stage. The revised dignity and respect policy, and the review report which you have requested, are due to be published later this year. As such, we consider it fair and sensible to publish these documents when they are complete, rather than making an early publication before the policy review has been completed. Publication as planned will allow for an accurate reflection of the steps that have been taken in light of the report and avert any risk of the policy review being hindered by early publication of related information. The planned publication should allow for appropriate transparency and accountability.

Section 22 is a qualified exemption. This means that, even if the requested information engages section 22, the “public interest test” needs to be considered. This test requires us to consider whether the public interest in disclosure at this earlier stage outweighs the public interest in withholding the information until the planned date of publication.

There is a general public interest in promoting transparency and accountability in relation to public authorities. However, the work to review the policy is ongoing and it is our view that accountability is best served by allowing a comparison of the review report alongside the steps that have been taken to revise the dignity and respect policy. In other words,

publication as intended will provide a fuller picture when holding us, as a public authority, to account.

It is also in the public interest to allow the Senedd Commission the space to carry out this review, based on information it has received in order to protect the quality of that review. To allow the draft report, as it stands presently, to be published would detract from the work involved in completing it.

Therefore, it is our view that the public interest arguments in favour of maintaining the exemption outweigh the public interest in early disclosure.