

## **Freedom of Information Act 2000 (FOIA)**

### **Decision notice**

**Date:** 17 March 2025

**Public Authority:** Cabinet Office  
**Address:** 70 Whitehall  
London  
SW1A 2AS

#### **Decision (including any steps ordered)**

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1. The complainant requested information from the Cabinet Office relating to national security vetting applications and outcomes.
2. The Cabinet Office refused to provide the information, citing section 24(1) (national security) of FOIA.
3. The Commissioner's decision is that the Cabinet Office correctly relied on section 24(1) to withhold the information.
4. The Commissioner requires no steps to be taken as a result of this decision.

## Background

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5. The Commissioner understands that the Cabinet Office is responsible for the government's personnel security and national security vetting policies<sup>1</sup>. However, the level of clearance needed for a particular post will be decided by the department/organisation and will depend on the particular role and responsibilities of the post. National security vetting may be carried out on recruitment or at any point subsequently when changes in duties or responsibilities require it.
6. National security vetting (NSV) is delivered by United Kingdom Security Vetting (UKSV)<sup>2</sup>.
7. UKSV provides information on five levels of security clearance<sup>3</sup> including:
  - Security Check clearance (SC):
  - Developed Vetting clearance (DV):
8. SC is the most widely held level of security clearance. It is required for jobs involving regular and uncontrolled access to sensitive information which is classified as 'SECRET', and some posts in international organisations. The process for SC clearance includes:
  - checks against UK criminal and security records;
  - a credit reference check;
  - if considered necessary, checks against the criminal and security records of relevant foreign countries.
  - it may also include an interview.

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<sup>1</sup> <https://www.gov.uk/government/publications/hmg-personnel-security-controls>

<sup>2</sup> <https://www.gov.uk/government/publications/vetting-explained-and-our-vetting-charter/vetting-explained>

<sup>3</sup> See Annex C - <https://www.gov.uk/government/publications/united-kingdom-security-vetting-clearance-levels/national-security-vetting-clearance-levels>

9. DV is the most detailed and comprehensive form of security clearance. It is required for sensitive jobs and tasks which involve long-term, frequent or uncontrolled access to 'TOP SECRET' material, or certain posts in international organisations. The process for DV clearance includes:
  - SC checks;
  - completion by the applicant of a DV questionnaire;
  - a review of the applicant's personal finances;
  - written testimony from an applicant's referees;
  - a detailed interview with an applicant conducted by a vetting officer.
10. UKSV<sup>4</sup> state the purpose of personnel security controls is to ensure that a person's character and personal circumstances are such that they can be trusted to work in a position which may involve access to sensitive assets or sensitive sites. The employing or contracting department, or the relevant vetting authority, will make the final decision in light of all the available information obtained during the vetting process.
11. UKSV advise that security clearances may be refused or withdrawn where:
  - There are security concerns related to an individual's involvement or connection with activities, organisations or individuals associated with the threats described (or any similar new threats that emerge);
  - Personal circumstances, current or past conduct indicate that an individual may be susceptible to pressure or improper influence;
  - Instances of dishonesty or lack of integrity cast doubt upon an individual's reliability;
  - Other behaviours or circumstances indicate unreliability.

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<sup>4</sup> See Annex C - <https://assets.publishing.service.gov.uk/media/63525f69d3bf7f19406d2f5d/20221031-HMG-Personnel-Security-Controls-V6.0-October-2022.docx.pdf>

12. UKSV also state that personnel security controls help to counter the threats to national security which may stem from:

- Foreign intelligence services.
- Terrorist groups.
- Those who wish to overthrow or undermine parliamentary democracy by political, industrial or violent means.

### **Request and response**

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13. On 26 June 2024, the complainant requested the following information from the Cabinet Office:

"In the last full year, 1 Jan 2023 to 31 Dec 2023, please can you provide a breakdown of vetting applications/outcomes as follows:

1. The total number of applications for SC clearance; of those, how many were granted or rejected.
  2. Please provide a numerical breakdown for each reason for rejection.
  3. The total number of applications for DV clearance; of those, how many were granted or rejected.
  4. Please provide a numerical breakdown for each reason for rejection." [numbers added by Commissioner]
14. The Cabinet Office responded on 24 July 2024. It said that while the information was held, the information was exempt from disclosure by virtue of section 24(1) of FOIA.
15. The complainant requested an internal review on 24 July 2024.
16. The Cabinet Office provided the outcome of that internal review on 22 August 2024 maintaining its position that the information was exempt from disclosure on the basis of section 24(1) FOIA.

### **Scope of the case**

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17. The complainant contacted the Commissioner on 3 September 2024 in order to complain about the Cabinet Office's decision to withhold the requested information.

18. During the course of the Commissioner's investigation, the Cabinet Office revised its position. The Cabinet Office explained that although it initially confirmed that it held all of the requested information in its response to the request (both in the refusal notice and internal review), it had since become apparent that it does not hold information "where customers such as government departments, for which UKSV carry out SC and DV clearances, do not provide UKSV with the vetting outcome".
19. The Cabinet Office explained that UKSV act as service providers for NSV across government and act on instruction of the departmental decision-makers responsible for the post requiring clearance. The decision to grant or deny NSV is usually made by these same departmental decision-makers, these are usually the government department or police force that holds the post requiring NSV clearance. On occasion, however, the Cabinet Office said that the decision-making authority does not update the record to show the vetting outcome.
20. The Cabinet Office acknowledged that it had therefore incorrectly confirmed under section 1(1)(a) that all the requested information was held by it. It revised its position to state that, in relation to part 3 of the request, the Cabinet Office does not hold the outcome, whether clearances were granted or denied, for a portion of cases [the Commissioner is aware of the exact number of cases but it cannot be included in the decision notice for reasons of confidentiality].
21. The Commissioner is satisfied by the Cabinet Office's explanation as to why such information is not held for the purposes of FOIA, and whilst the previous inaccurate responses are unfortunate, there are no remedial steps that are necessary to rectify this error. However, the Commissioner has commented on this in the Other Matters section of the decision notice.
22. In its submission to the Commissioner, the Cabinet Office confirmed its reliance on section 24(1) (national security) to withhold the information it does hold.
23. The Commissioner considers that the scope of his investigation is to determine whether the Cabinet Office was entitled to rely on section 24(1) to withhold the requested information which the Cabinet Office does hold.

## Reasons for decision

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### Section 24 – national security

24. Section 24(1) of FOIA states that:

“Information which does not fall within section 23(1) [information supplied by, or relating to, bodies dealing with security matters] is exempt information if exemption from section 1(1)(b) is required for the purpose of safeguarding the national security.”

25. In broad terms, section 24(1) allows a public authority not to disclose information if it considers that the release of the information would make the United Kingdom or its citizens vulnerable to a national security threat.

26. Although there is no definitive definition of national security, the Information Tribunal for Norman Baker v the Information Commissioner and the Cabinet Office ([EA/2006/0045](#) 4 April 2007) provided the following:

- “national security” means the security of the United Kingdom and its people;
- the interests of national security are not limited to actions by an individual which are targeted at the UK, its system of government or its people;
- the protection of democracy and the legal and constitutional systems of the state are part of national security as well as military defence;
- action against a foreign state may be capable indirectly of affecting the security of the UK; and
- reciprocal co-operation between the UK and other states in combating international terrorism is capable of promoting the United Kingdom’s national security.

27. The exemption applies where withholding the information requested is “required for the purposes of safeguarding national security”. The Commissioner considers this to mean that the exemption can be applied where it is reasonably necessary in order to safeguard national security. However, it is not sufficient for the information sought simply to relate to national security. In the Commissioner’s view, there must be a clear

basis for arguing that disclosure would have an adverse effect on national security.

28. This, however, does not mean that it is necessary to demonstrate that disclosing the requested information would lead to a direct or immediate threat to the UK. Support for this approach is taken from the Rehman<sup>5</sup> case and especially from the following observation by Lord Lynn:

"To require the matters in question to be capable of resulting 'directly' in a threat to national security limits too tightly the discretion of the executive in deciding how the interests of the state, including not merely military defence but democracy, the legal and constitutional systems of the state need to be protected. I accept that there must be a real possibility of an adverse effect on the United Kingdom for what is done by the individual under inquiry but I do not accept that it has to be direct or immediate."

29. Safeguarding national security therefore includes protecting potential targets even if there is no evidence that an attack is imminent.

### **The complainant's view**

30. The complainant said that in his view the release of the limited information he requested would not damage national security. He argued he was not seeking information on the nature of the vetting itself, just numbers.
31. The complainant explained that he was "seeking data as to the widespread proportionality of vetting decisions". He believed that asking only for "the number of vetted persons and the pass/fail rates" prevents hostile actors obtaining useful information to make any assessment of the UK's security. He contended that the number of applications accepted/rejected allows for the public - and vetted persons - to have an understanding of the fairness and proportionality of those cases which are not accepted, and the reasons why.
32. In support of his position he also argued that:

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<sup>5</sup> <https://publications.parliament.uk/pa/ld200102/ldjudgmt/jd011011/rehman-1.htm>

- NSV can apply to civil servants, diplomats, contractors (such as builders or support staff) - to receptionists and cleaners within government buildings.
  - If he had asked for the number of vetted people within MI5, this would arguably prejudice the security of MI5 - because it would indicate to hostile actors the strength of our intelligence services.
  - His request is no different to the same request being made to police about police vetting or for disclosure of the number of DBS certificates – disclosure of the numbers doesn't compromise the purpose of such vetting.
  - He disagrees with the suggestion that disclosure could prejudice the affairs of the UK's security.
33. The complainant also told the Commission that he would be willing to accept a refinement to his request to include only people who are vetted to SC level. He explained that this would mean that those who have frequent access to top-secret information (at DV level) are not included and therefore the risk of disclosing the requested information is minimal.

### **The Cabinet Office's view**

34. By way of background, the Cabinet Office explained that the assurances offered by UKSV are relied on by over 140 customers, including central government, public authorities and contractors.
35. The Cabinet Office told the Commissioner that it considered that the release of comprehensive vetting statistics for 2023, including the annual number of vetting applications processed, denial rates and a breakdown of the reasons for denial, could provide adversaries, such as terrorists, hostile state actors and serious organised crime groups, with insights into personnel security controls and measures and potential loopholes, thereby posing specific and real threats to UK national security and on the safe functioning of the government.
36. Regarding providing adversaries with insights into security measures and potential loopholes, the Cabinet Office explained that:
- To maintain the integrity of national security vetting it considered that it is important to limit the amount of ancillary information that is put into the public domain about the vetting system to minimise the risk posed by hostile actors, including the number of security clearances completed.



- Disclosure of the information could provide an insight into the vetting decision making process, vetting policy and risk appetite across government. This would reveal the relative weight placed on different security risks, informed by emerging trends. This would also undermine the integrity of the process and enable a profiling of risk by hostile actors, to the detriment of the government and the national security of the UK.
- The information would give such hostile actors a sense of scale of security vetting conducted by the Government in a year, in this case 2023.
- Revealing the details of volumes of security clearances or refusals would provide an opportunity to hostile actors to attempt to identify and exploit vulnerabilities in the government's security vetting procedures, thereby presenting a risk to national security.
- If the Cabinet Office were to disclose into the public domain (and logically, were to do so on a regular basis) a breakdown of the grounds upon which UKSV has refused vetting applications it would give hostile actors valuable information as to what applicants should avoid disclosing in submitting their applications. This would be of assistance to those who intended to stage manage applications. In so publicly displaying the reasons for rejecting applications, UKSV would be publicising potential vulnerabilities increasing the chances of insider risk which is a threat to the national security of the UK.
- Releasing the number of denials - especially when coupled with the numbers of clearances processed - could give insight into (a) trends in how risk is considered across the government in any given year; and (b) the number of people with valid clearances, who could in turn be targeted. It would provide hostile actors who stage manage applications with additional insight into the process.
- The reasons for denial are also sensitive information that the Cabinet Office want to withhold for reasons of national security. The reasons replicate the core risks in the Vetting Decision Framework (VDF), a guide to vetting officers as to what factors to take into account when making vetting decisions. The VDF is a very detailed and hugely important document that the Cabinet Office consistently seeks to protect from wider public scrutiny. This is because any information in the VDF could give an insight into vetting methodology which could be used by hostile actors to identify vulnerabilities in the vetting process, make assumptions about what areas of risk the process does or does

not focus on, and manoeuvre applications so they avoid those areas of risk.

- The absence of public acknowledgement as to what would merit rejecting an application by UKSV is a strength of the vetting process, encouraging applicants not to adapt their applications according to what they consider UKSV would find acceptable.
  - The more information on NSV that goes into the public domain, the greater the risk of it being aggregated with other publicly available information and the greater the possibility of false assumptions being made, misinformation being spread, manipulation of the information, or attack by a hostile actor using the information to their advantage.
  - Any erosion of the integrity of NSV through the piecemeal release of information presents an unacceptable and unmitigable risk to the government.
37. The Cabinet Office was also concerned with the potential “mosaic” threat of disclosure. They explained that when aggregated with other data available to hostile actors, the requested information could help create a mosaic effect enabling the construction of a picture of UK vetting. In turn, the disclosure of the denial reasons and volumes when aggregated with other datasets would afford hostile actors an insight and allow inferences to be drawn into personnel risk across the government. This would reveal where there are weaknesses and procedural challenges within government by highlighting where vetted staff are located across the UK and the demographic of vetted staff across government departments. This would limit the effectiveness that vetting safeguard provides and allow inferences to be drawn on ongoing personnel risk management across government and industry. Hostile actors could also make incorrect assumptions, inaccurate comparisons or inferences about how NSV operates.
38. Further, the Cabinet Office explained that the compromising of the vetting system and processes by the aggregation of data could enable a hostile actor to gain access to sensitive roles within the government, together with access to sensitive information. The availability of such information would present an unmitigable security threat to the UK.
39. In response to the complainant’s specific points made at paragraphs 30-33 above, the Commissioner asked the Cabinet Office to address these in submissions and it responded as follows:
- Assessment of security threat:

- while the requester argues that the data requested does not directly allow hostile actors to assess security, aggregated information when combined with other available information could still contribute to a broader understanding of vetting practices that could be exploited. Such analyses could reveal trends and patterns that might be exploited to identify potential vulnerabilities in the vetting process or target individuals involved in national security roles. This could enable hostile actors to deduce operational security frameworks. Such actors could use the information to infer details about security clearance processes and the volume of personnel with specific access levels. It might contribute to strategic targeting by adversaries who could focus on individuals with known clearance levels, thus threatening the security of government operations. It may also inadvertently assist in the identification of personnel who have access to sensitive information.
- Proportionality of vetting decisions:
  - The Cabinet Office acknowledges the interest in understanding the fairness and proportionality of vetting decisions. However, it explained that its priority is to ensure that such transparency does not inadvertently compromise national security measures. It was also mindful of receiving further requests for information in relation to the quantity of vetting applications. The disclosure of the information could encourage further (and more regular) requests for more detailed breakdowns of information, incrementally eroding the confidentiality essential to national security vetting procedures. Over time, this could compromise the effectiveness of security measures designed to protect national interests.
- Comparison with police vetting and DBS checks:
  - unlike police vetting or DBS checks, which are more localised and specific to certain roles, the national security vetting process is integral to a broader national security framework and is inherently linked to state security and intelligence operations, necessitating a higher level of confidentiality. These checks are fundamental to protecting national interests and maintaining the integrity of governmental operations, which differ significantly from other types of vetting

processes. The implications of disclosure are thus more extensive and impactful, requiring stricter confidentiality.

- Refinement to SC level vetting:
    - while the requester suggested refining the request to SC level vetting, the Cabinet Office maintained that even partial disclosure could pose risks. The SC level is a critical security threshold, and while less stringent than DV, still involves access to sensitive information that is crucial to national interests and the functioning of government. Sharing information in relation to SC applications could still provide valuable insights to those looking to exploit security systems. It considered that the vulnerabilities identified in respect of the information as a whole apply to that relating to SC level vetting. That is to say, it could be subject to aggregated analysis and give insight to how trends in risks are considered across the government in any given year and highlight the number of individuals with a valid SC clearance, which could lead to these individuals being targeted by hostile actors.
40. The Commissioner also asked the Cabinet Office to comment on a National Audit Report<sup>6</sup> (NAO) from 2018 which released the volumes of security clearances for a period of 18 months. It is noted that these figures covered all clearance levels but did not highlight whether applications were granted or denied, nor did they cover the number of denials for any given reason.
41. The Cabinet Office argued that there are factors that distinguish the approach taken by the NAO with the approach taken in response to this request as follows:
- The information provided to the NAO highlighted the broad volumes demonstrating UKSV throughput and whether performance was fit for purpose. The requester's request for data is more specific, for example by seeking the number of clearances denied broken down by the reason for denial. This offers much greater insight into the vetting landscape which,

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<sup>6</sup> <https://www.nao.org.uk/reports/investigation-into-national-security-vetting/>

when combined with other publicly available information could be used by hostile actors.

- The threat landscape has evolved since 2018 with an increased risk of insider threat across government. This insider threat means the requirement to protect recorded vetting information including clearance volumes, especially current volumes, has grown to ensure that hostile actors are unable to piece information together to circumvent the NSV processes and gain access to vetted roles across central government, public authorities and contractors.
- Erosion of NSV through increased information entering the public domain is extremely difficult to mitigate, potentially jeopardising the safeguarding of national security which NSV is designed to protect. This approach has been accepted by the National Security Liaison Group.

42. The Cabinet Office was therefore satisfied that it was necessary to withhold the requested information for the purposes of safeguarding national security.

### **Is the exemption engaged?**

43. The Commissioner has considered the arguments put forward by the complainant and the Cabinet Office. Some representations from the Cabinet Office were provided in confidence. He has also consulted his guidance on section 24<sup>7</sup>.

44. The Commissioner has viewed the withheld information and the published links on this matter. He notes that the number of security vetting applications, grant/rejection numbers and reasons for rejections are not routinely published by the Cabinet Office. He recognises that terrorists and hostile or malicious actors can be highly motivated and may go to great lengths to gather information. This means there may be grounds for withholding what seems harmless 'numbers' information on

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<sup>7</sup> <https://ico.org.uk/for-organisations/foi-eir-and-access-to-information/freedom-of-information-and-environmental-information-regulations/section-24-safeguarding-national-security/>

the basis that it may assist such individuals when pieced together with other information they may obtain.

45. The Commissioner can certainly appreciate why information held in relation to the request for statistics would appear relatively harmless or of very limited use to those with malicious intent. Conversely, he can understand why information held in relation to the overall number of applications, grant/rejection numbers and rejection reasons for vetting would be very useful intelligence to those with malicious or hostile intent. Nevertheless, the test is whether withholding the information in scope is reasonably necessary for the purposes of safeguarding national security. There is no requirement on the public authority to show that disclosure would lead to a direct or immediate threat to the UK.
46. The Commissioner considers that disclosing the requested information, however limited or apparently harmless, may allow malicious or hostile actors or those seeking to commit acts of terrorism to gain insight into the vetting methodology/process, and to identify and exploit perceived vulnerabilities in the UK's security vetting procedures, and manoeuvre applications so they avoid those areas of risk. This, in turn, would threaten national security.
47. Having considered the arguments put forward in this case, the Commissioner is satisfied that the exemption from the duty to disclose the information is required for the purpose of safeguarding national security.
48. The section 24(1) exemption is therefore engaged.

### **Public interest test**

49. Section 24(1) is a qualified exemption and therefore subject to the public interest test set out in section 2(2)(b) of FOIA. The Commissioner has therefore considered whether, in all the circumstances of the case, the public interest in maintaining the exemption cited by the Cabinet Office outweighs the public interest in disclosing the information.

### **Public interest in disclosing the information**

50. The complainant considers that it is in the public interest for data about the proportionality of vetting decisions to be disclosed.
51. The Cabinet Office also acknowledge the general public interest in transparency and the public interest in understanding the fairness and proportionality of vetting decisions and the extent to which applications for vetting are accepted or rejected.

52. The Commissioner also recognises that the disclosure of the requested information could benefit the public by providing visibility of the security vetting standards applied to personnel and reinforce confidence in the UK's security vetting procedures to counter the threats to national security which may stem from foreign intelligence services, terrorist groups and those who wish to overthrow or undermine parliamentary democracy by political, industrial or violent means.

### **Public interest in maintaining the exemption**

53. The Cabinet Office explained that there is a very obvious and strong public interest in safeguarding national security and it considers that this firmly outweighs any interest in greater transparency around this subject. It argued that erosion of NSV through increased information entering the public domain is extremely difficult to mitigate, potentially jeopardising the safeguarding of national security. This is because the sensitive nature of the information, if mishandled, could lead to unintended consequences that compromise the safety of the public, public servants and the effectiveness of security strategies.
54. The Cabinet Office further explained in submissions that it considers that there is a strong - and specific - public interest in upholding the robustness, effectiveness and integrity of the security vetting process. This is because upholding national security requires personnel who have been deemed suitable to handle it appropriately. This requires a security vetting process that would not be undermined by disclosures of information that would be useful to hostile or malicious actors who would seek to undermine it.
55. The Cabinet Office also noted that applicants for security vetting are told that the vetting process is a confidential one. Therefore, the Cabinet Office argued that disclosure of the requested information about the process, including the reasons for refusing applications, would erode that confidentiality. This could have the consequence of deterring applicants if they felt that confidentially supplied information may be reflected in published reasons for refusing an application. This would undermine national security and would not be an outcome that was in the public interest.
56. As referred to above, the Cabinet Office explained that even the release of recorded information of current volumes of clearance levels would compromise the ability of the Government to successfully deliver the safeguards that vetting offers. Although volumes of clearances completed on time were released by the NAO in its 2018 report, the



Cabinet Office explained that these are now of an historic nature, relating to the period between January 2017 and July 2018. These figures covered all clearance levels but did not highlight whether applications were granted or denied, nor did they cover the number of denials for any given reason. The Cabinet Office argued that disclosing the requested information could highlight the number of civil servants who do not hold any form of security vetting, which could lead to incorrect assumptions being made that this is a security threat to the UK. They considered that there is a public interest in such misinformed assumptions not taking flight if the result were to undermine the trust that the public has in security vetting processes.

### **Balance of the public interest**

57. The section 24 exemption is engaged. However, the balance of the public interest in maintaining the section 24 FOIA exemption is determined by the importance to the UK national security of disclosing or withholding the information.
58. The Commissioner considered all of the circumstances of this case, including a review of the withheld information. The Cabinet Office has provided a breakdown of the statistics requested including the reasons for denial of clearance, but they cannot be discussed further in this decision notice due to the sensitivity of the information in question.
59. The Commissioner acknowledges that there will always be a general public interest in transparency surrounding national security vetting. This will inform the public and improve public confidence and understanding.
60. He also recognises the obvious and weighty public interest in safeguarding national security. The Commissioner notes that the international security landscape is complex and unpredictable and that the UK has faced a sustained threat from terrorists, foreign intelligence services, and malicious actors in the past and will do so in the future. He also accepts the Cabinet Office's argument above that the threat landscape has evolved significantly since 2018 with an increased risk of insider threat across government. Safeguarding national security is therefore a matter of the most fundamental public interest; its weight can be matched only where there are also fundamental public interests in favour of disclosure of the withheld information.
61. With that in mind, he gives weight to the argument that disclosing the requested information in this case would meet the public interest in transparency and accountability. Disclosure of the information would



also meet the complainant's stated interest in being able to fully analyse the data and in particular to identify any disproportionality.

62. However, balanced against this, the Commissioner must consider whether disclosure would have any effects which would run counter to the public interest in safeguarding national security, and if so, whether they are outweighed by the benefits of disclosure.
63. He is particularly mindful of the fact that public authorities will have in their possession, some of the country's most sensitive information which in the wrong hands could do very serious damage to national security. This fact alone undoubtedly makes access to vetting information a high value target for actors with malicious or hostile intent. It would not be in the public interest for hostile actors to be able to piece information together to circumvent the NSV processes and gain access to vetted roles across central government, public authorities and contractors.
64. In addition, he is mindful that individuals with SC and DV clearance are in occupations or posts considered to be important to national security. They reasonably expect that the vetting process is a confidential one. This in itself means that it was not in the public interest to facilitate the disclosure of the reasons for refusing applications or the targeting of such individuals and thus compromise their security and the credibility of the vetting process by disclosing the detailed information requested.
65. With reference to his guidance, the Commissioner recognises "that terrorists can be highly motivated and may go to great lengths to gather intelligence". The Commissioner also refers to the First-tier Tribunal decision in his guidance (Philip Kalman v Information Commissioner and the Department for Transport, EA/2009/0111 6 July 2010), which found that 'the consequences of a successful terrorist attack ... were so great that even if there was only a low risk that disclosing the information would aid such an attack, there was a very strong public interest in withholding the information.'
66. The Commissioner accepts that, on its own, the requested information appears to be numerical only representing a snapshot in time.
67. However, he accepts the view that releasing the number of applications, the number of successful and unsuccessful applications, the rejection reasons, and the number of individuals affected for the relevant period could indicate how robust the government's personnel security defences were. It is not inconceivable that malicious or hostile actors could be able to stage manage applications, avoid disclosing certain information in applications or exploit vetting vulnerabilities from the statistical

information released pursuant to this request, when pieced together with existing or prospectively available information whether gathered lawfully or not. In the Commissioner's view, and for the reasons set out above, this makes withholding the requested information reasonably necessary in order to safeguard national security.

68. Disclosure under FOIA is also disclosure to the world at large, not just the requester. Disclosure in this case would enable anyone to analyse the data and it would allow malicious actors or terrorists to highlight any vulnerabilities and intelligence gaps. While not able to predict what information a hostile or malicious actor may have access to, the Commissioner is mindful for example, that, if a series of requests were received, each specifying different timeframes, it might be possible to identify the full picture and the reasons for rejection. This would clearly not be in the public interest. Any erosion of the integrity of NSV through the piecemeal release of information presents an unacceptable risk to the government.
69. In the circumstances of this case, the Commissioner is persuaded that information requested would be useful to those hostile and malicious actors identified above. He considers that the public interest in maintaining the exemption outweighs the public interest in disclosing the information. It follows that the Cabinet Office was entitled to rely on section 24(1) of FOIA to refuse to disclose the requested information in order to safeguard national security.

## **Other matters**

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70. Given the issues discussed at paragraphs 19-22 above, the Commissioner wishes to highlight the importance of public authorities establishing exactly what recorded information it holds in the scope of a request both when a request is initially processed and at the internal stage.

## Right of appeal

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71. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)  
GRC & GRP Tribunals,  
PO Box 9300,  
LEICESTER,  
LE1 8DJ

Tel: 0203 936 8963  
Fax: 0870 739 5836  
Email: [grc@justice.gov.uk](mailto:grc@justice.gov.uk)  
Website: [www.justice.gov.uk/tribunals/general-regulatory-chamber](http://www.justice.gov.uk/tribunals/general-regulatory-chamber)

72. If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.
73. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

**Jonathan Slee**  
**Senior Case Officer**  
**Information Commissioner's Office**  
**Wycliffe House**  
**Water Lane**  
**Wilmslow**  
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**SK9 5AF**