



Ministry of Defence  
Main Building  
Whitehall  
London  
SW1A 2HB

Ref: FOI2018/11771

[REDACTED]

Reply to: [REDACTED]

10 October 2018

Dear [REDACTED]

Thank you for your email of 16 September 2018 requesting the following information:

*"I'm getting in touch regarding a freedom of information request concerning reports of bullying, harassment and sexual harassment at Ministry of Defence sites in Scotland, including Faslane naval base (HMNB Clyde).*

*We wish to know the breakdown of these types of complaints on a yearly basis over the last 10 years.*

*We understand confidentiality is paramount, however if you could provide a breakdown of these complaints per year regarding their nature i.e. bullying, sexual harassment etc. that would be much appreciated."*

I am treating your correspondence as a request for information under the Freedom of Information Act 2000 (FOI Act).

I must advise that this request is exempt under Section 12 of the FOI Act because it has been calculated that action to determine whether the Ministry of Defence (MOD) holds information within scope of this request as currently presented would exceed the cost limit set by the FOI Act.

The FOI Act does not require the Department to create data in order to release it under the Act, and in this case we would need to review at least 360 Service Complaints, mostly from archive. Those cases would need to be accessed to ascertain the ones which relate to alleged bullying, harassment or sexual harassment; and from those, to distinguish which of them were made by personnel when based in Scotland and which related to incidents occurring in Scotland, as well as the reports of incidents which were reported in Scotland but where the incident occurred elsewhere. This action is estimated to cost approximately £2,300, which would take us over the cost allowed under the FOI Act.

Section 12 of the FOI Act makes provision for public authorities to refuse requests for information where the cost of dealing with them would exceed the appropriate limit, which for central government is set at £600. This represents the estimated cost of one person spending 3.5 working days in determining whether the department holds the information, and locating, retrieving and extracting it.

Under Section 16 of the FOI Act, public authorities are required to provide the requester with advice and assistance especially where a request for information exceeds the appropriate cost limit. Therefore, I can advise you that we may be able to provide some information in scope of your request if you reduce or refine your request to bring the cost of compliance under the limit. You might wish to consider shortening the time period to less than the required 10 years - possibly to a single year, or limiting your request to only one of the three categories mentioned above.

However, please note that your request might still be subject to other exemptions.

Bullying, sexual harassment or assault is unacceptable - whether in the Armed Forces or across wider society. I can advise you that there are several processes and safeguards in place across the Armed Forces to ensure that victims of such offences are properly supported and that any allegations are properly investigated.

It is made clear that bullying, sexual harassment or assault is not tolerated within the Armed Forces. This behaviour is incompatible with the core Values and Standards of our Services, and is not the behaviour expected of our personnel. We care about our personnel above all else, respecting each one as an individual, and we do everything we can to train and care for them to the very highest standards. Unfortunately, there is the potential for bullying and harassment or sexual harassment to take place in any organisation where people work together, and the Armed Forces are no exception. Therefore, the effectiveness of the action we take to prevent and deal with incidents of bullying, sexual harassment or assault is unacceptable are important.

The MOD takes all allegations very seriously and we encourage any allegation of unacceptable behaviour to be raised to the attention of the Chain of Command to be investigated accordingly. Every unit has a comprehensive welfare system, which is widely publicised. The network of agencies includes Service chaplains, Equality and Diversity Advisers and Unit/Station Welfare Officers. Personnel also have access to the confidential helpline, SpeakOut, and the Samaritans helpline.

All personnel receive annual Diversity and Inclusion and Respect for Others training. As part of this they learn about what constitutes unacceptable behaviour. They are also made aware of how to report any unacceptable behaviour. Throughout their training, Officer Cadets are continually briefed on discipline, welfare, diversity and inclusion, and the core Values and Standards.

If you have any queries regarding the content of this letter, please contact this office in the first instance.

If you wish to complain about the handling of your request, or the content of this response, you can request an independent internal review by contacting the

Information Rights Compliance team, Ground Floor, MOD Main Building, Whitehall, SW1A 2HB (e-mail [CIO-FOI-IR@mod.uk](mailto:CIO-FOI-IR@mod.uk)). Please note that any request for an internal review should be made within 40 working days of the date of this response.

If you remain dissatisfied following an internal review, you may raise your complaint directly to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that the Information Commissioner will not normally investigate your case until the MOD internal review process has been completed.

The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website at <https://ico.org.uk/>.

Yours sincerely,

Defence People Secretariat FOI