

[REDACTED]

24 February 2011

Professor Salmon,

THE MIGRATED ARCHIVES : WHAT WENT WRONG AND WHAT LESSONS SHOULD WE DRAW?

1. I was asked to look into the circumstances surrounding holdings of colonial administration files at Hanslope Park, with Terms of Reference at Flag A.
2. To explain why relevant files from these holdings were not identified for the purposes of particular requests, it is necessary to understand the genesis and history of the "migrated archives".

History of the Migrated Archives and uncertainty over their status

3. As British dependent territories came to independence decisions had to be taken about which papers to destroy, which to leave for successor administrations, and which to ship back to the UK. The general rule, as set out in a Colonial Office guidance telegram of 3 May 1961 on the 'disposal of classified records and accountable documents', was that successor Governments should not be given papers which:
 - might embarrass HMG or other Governments;
 - might embarrass members of the police, military forces, public servants or others eg police informers;
 - might compromise sources of intelligence information; or
 - might be used unethically by Ministers in the successor Government

In addition "*There would be little object in handing over documents which would patently be of no value to the successor Government*". A great many documents were destroyed on this basis, but others were returned to the UK. These became the so-called 'migrated archives', eventually totalling around 8,800 files.

4. Apart from some highly classified files that were subsequently destroyed or lost, which are the subject of a separate enquiry, the Kenyan archive was stored in 294 boxes of some 1500 files that were sent back in 1963. The papers include, *inter alia*, Executive Council minutes from 1939 to 1957, War Council minutes from 1954 to 1961, Council of Ministers' minutes from 1954 to 1963, Intelligence Committee minutes from 1953 to 1961, and a complete set of Provincial and District Intelligence Summaries for 1953 to 1961. The Acting Governor commented at the time that this last series, in particular, could not be made available to research workers for many years to come, but should nevertheless be preserved because it contained material of historic value [recorded in LRD's 1981 chronology, para 8 below].

- ██████████
5. Between 1963 and 1994 the files were stored at Hayes repository. In 1994 they were moved to Hanslope Park, to save on storage costs.
 6. Almost from the beginning, there was uncertainty about the status of the migrated archives. As time went on, as will be seen, this extended to confusion within IMG about the content of the holdings. This investigation has been restricted to the Kenyan files, but the same uncertainty applies to the migrated archives as a whole.

Ownership of the Kenyan files within the migrated archives

7. The Kenyans made their first request for return of the documents in 1967. They were told that the papers were the property of HMG, which would not return the material. It is clear from internal minuting leading to this response that the content of the Kenyan holdings was well understood at that time: *"The vast majority of the files concern the Emergency (eg intelligence reports and summaries, African associations, activities of Africans, unrest in the districts etc, collective punishment, detainees and detention camps... Many others are no doubt indirectly connected with the Mau Mau, especially those referring to individuals and political parties"* [Folio 4 of piece number FCO 31/211]. The decision not to return the files was based on a combination of a 'thin end of the wedge' argument (If we return some files, we shall draw attention to the existence of others for which we shall then be asked, and that we may not wish to release) and a 'dangerous precedent' one (If we return Kenyan files after reviewing them for sensitivity we might find it difficult to withhold un-reviewed and potentially sensitive papers from other former colonies).
8. The Kenyans returned the charge in 1974 and again in the early 1980s. In the latter context, Library and Records Department (LRD) produced a useful chronology of the origin of the Kenyan papers and subsequent action in connection with them (██████████) [file reference redacted]. It included some PQs from Andrew Faulds MP who had asked in 1971 why the Kenyans had been denied access to pre-independence Executive Council records. He was told it was because these related to a *"UK Government interest, not a Kenya colony interest"*. In the background note accompanying the draft of that reply it was noted that the files were time-barred. But the Minister was advised to say, if pressed, that the papers would end up in the Public Records Office (PRO).
9. That was in 1971. But a decade later the PRO position had changed. At a meeting with LRD in March 1982 ██████████ of the PRO explained, in relation to the migrated archive from Aden, that these *"were not UK public records within the meaning of the Public Records Act. They were records of the former Colonial Government Administration most of which, but for concern over their safety, would have been handed over to the incoming government on Independence"* (██████████) [file reference redacted]. ██████████, proposed that *"the general question of the return of colonial records should be examined 50 years after the date when the first colony, Ceylon, became independent – ie in 1998."* The Legal Adviser, ██████████, minuted that *"I doubt we can wait until 1998 before looking more closely at the general question of the return of colonial records. We are bound to come under continuing pressure on this"* (██████████) [file reference redacted]. But this did not prompt further action at the time.

[REDACTED]

10. In February 1995, [REDACTED] confirmed successful physical transfer of the migrated archives from Hayes to Hanslope Park ([REDACTED]) [file reference redacted]. He went on to note that the question of what to do with these papers had last been seriously addressed in 1982, and set out the options as he saw them:

"Four options:

- a) *Since none of the countries concerned has in the last 12 years shown any interest in these records there is no point in keeping them, and they should be destroyed.*
- b) *It is decided that they are UK public records and they should go through the same process as FCO files prior to transfer to the PRO.*
- c) *Selection and sensitivity review and return to the successor government.*
- d) *Use the line taken with Kenya as a precedent and answer any queries from the successor governments by admitting that certain records were destroyed or returned to the UK, but these are the property of HMG and we do not intend parting with them."*

He recommended that "it should be determined by reference to the PRO and the Lord Chancellor's Office, whether or not we are dealing with public records". If not, he favoured the final option above – though rather than retain these records within FCO (covered by a so-called "Lord Chancellor's Instrument" to permit retention beyond 30 years) his thought was that we might weed/review the files sufficiently to enable them to be handed over to a repository such as Rhodes House Library, Oxford.

11. [REDACTED] observed in her comment on this minute that the papers were "surely" public records. "The question then is whether to proceed and review now or wait until the spuriously agreed 1998 date". The outcome was further postponement. This clearly frustrated [REDACTED], who continued to press for a decision. As he had noted in his February minute: "We continue to have 2000 boxes of files gathering dust, some of the contents of great interest, but which cannot be seen by researchers etc in case the cat is let out of the bag" (by this I take him to mean not that any particular dark secret would be exposed, but that it would emerge that the status of the archives had never been determined).

12. I have contacted [REDACTED] in retirement for her recollection of why no action was taken at this time. She says she was certainly aware that the migrated archives "might contain potentially sensitive /interesting material which could become the focus of FOI requests or any other requests for access. Just as all of the unreleased and unreviewed miles of records held by the FCO all the time is now open to such requests... We should of course have wished to defuse and deal with them by getting them reviewed and assessed on a detailed basis and deciding what to do with them. But I am afraid we did not have the time or resources to deal with them all. Indeed in the run up to FOI we could barely manage to do the annual 30 year review on time [which, she might have added, is a statutory obligation.] Of course you might reasonably say that the case for getting more resources to deal with collections such as the migrated archive should have been made more forcibly. But it wasn't – and I think

[REDACTED]

that may have had as much to do with some basic risk assessment as simply – and regrettably – being too busy to cover all bases.”

13. [REDACTED] minute of February 1995 also made reference to the status of the Cyprus pre-independence migrated archive: “Sometime after their arrival in LRD in 1969 they went through the process of selection review and listing ready for despatch to the PRO”. The PRO had gone so far as to give the papers a reference number (CO 979). But they had second thoughts about taking the papers. [REDACTED] commented, about the migrated archives as a whole, that: “although in the past the PRO has said that these are public records, their status under the Public Records Acts has not been determined. I believe that the PRO would not now accept them.”
14. In the “Planning and Review Framework” for 1995, [REDACTED] enjoined the FCO to “use best efforts to ensure that a review programme to process the records transferred in the last year from Hayes to Hanslope Park...is put in place. A complete schedule of these records will be completed by the end of 1995 to allow planning of the action required.” But there were too many competing priorities. [REDACTED] minuted to [REDACTED] that “from statistics already produced there are early indications of resource problems ...As soon as further statistics and information are available to enable me to form my decisions I will minute you the programme and my suggested recommendations” ([REDACTED] [file reference redacted]). But no programme was ever carried out – or at least not a comprehensive one. I have spoken to [REDACTED] in retirement, but she no longer has any recollection of the particular circumstances that caused this postponement.
15. In February 1996, [REDACTED], [REDACTED] who was responsible for the annual programme for the review of old papers, informed [REDACTED] that he had now had time to research the papers in some detail and he was in no doubt that the PRO should accept the Kenyan migrated archive, at least, on the grounds that they belonged to Government House rather than to the Kenyan Government ([REDACTED] [file reference redacted]). But either PRO refused that request, or the case was not pressed again at that time.
16. [REDACTED] annual report on FCO documentation performance in 1997 ([REDACTED] [file reference redacted]) noted that: “Work is continuing to deal with the older records recently moved to Hanslope Park, a large number of which are awaiting a decision from another Government Department before action can be taken”. A footnote explains that this refers to registers of births, deaths and marriages believed to be copies of master registers passed to predecessors of the Office of National Statistics – and this allusion to administrative holdings within the migrated archives may help to explain how the impression began to take hold that the archives as a whole were essentially administrative and uninteresting. In a Note for the File of 29 August 1997 [REDACTED] recorded that “In the opinion of the [REDACTED] (ie [REDACTED]) approval is not required for the Western Pacific and migrated records (my underlinings) as they are not in fact or technically speaking proven to be our official public records” ([REDACTED] [file reference redacted]). This epitomises the confusion that by then reigned over the status and content of the archives. Because the papers were not deemed to be official public records, and because the FCO now saw itself as their custodian rather than their owner, they came to be almost ‘off limits’.

[REDACTED]

Hong Kong

17. In 1995/6 there was discussion about how to treat migrated Hong Kong files once Hong Kong's sovereignty transferred to China. An FCO/PRO submission to the Lord Chancellor argued that these were not UK public records and did not fall within the Lord Chancellor's Ministerial responsibilities, but that any original or filmed copies that passed into the ownership of the FCO would become UK records on 1 July 1997 ([REDACTED]) [file reference redacted]. In 1996 the Lord Chancellor gave his approval in principle for the retention of certain HKG records of special sensitivity for 50 years after their transfer to UK Government ownership ([REDACTED]) [file reference redacted].

Recent activity relating to the migrated archives

18. As a consequence of confusion over ownership, the Kenyan migrated archive was left in limbo: neither accepted by TNA for the public record, nor formally acknowledged by the FCO. Unless it catalogued the files and conducted a full sensitivity review, the FCO could neither release the files (whether to successor Governments or to private repositories) nor consult them in any systematic way for the purposes of FoI and other search requests, nor even apply for a Lord Chancellor's Instrument to authorise retention of them. But no such review was conducted. In part, this was because of resource constraints: the Department has struggled to keep up with the annual statutory requirement to select, review and redact files for acceptance by the the National Archives (TNA), and in recent years it has also faced an unrelenting flow of FoI requests. But in part it also reflected a failure by successive senior managers to grip what should have been seen to be an unresolved and potentially explosive problem.
19. Over recent years the Department also lost collective memory about the content of these archives. The erroneous conviction developed that the papers (which do indeed contain some material such as birth/death/marriage registers) were essentially administrative and/or ephemeral, and that insofar as there might be substantive papers these would be replicated in Colonial Office records that were already in the National Archive. It is clear from para 25 ii below that this was also the TNA's view. It also came to be wrongly understood that the records were unsearchable because there were no file lists. In fact there are file lists, though there is no data-base for the purposes of systematic searches.

Physical storage of the migrated archives

20. The way in which the files were stored also contributed to the failure to consult them.
21. Originally, as noted, they were stored at Hayes. When they were transferred to Hanslope Park in 1994 they were kept alongside the main FCO Archive. But since 2006 they have been stored on a different floor of the building from other historic papers. They are lodged with the Retrievals Section, which is responsible for searches of FCO material of between 3 and 30 years old, rather than being lodged with the section responsible for searches of historic papers.
22. I have no doubt that [REDACTED] would have searched the migrated archives had they understood the contents better and had they

[REDACTED]

believed the papers to be relevant to any of the requests they had received. That was the main reason that the files were overlooked. But the fact that neither saw the migrated archives as their particular lead – because of their age, in [REDACTED] case, and because of their physical situation in [REDACTED] – undoubtedly contributed to the recent problems.

23. Another point is that the files are stored in stacks labelled “Hayes Classified Archive”. This gave some staff the impression that the FCO was holding the files on behalf of some other agency called Hayes – where, according to a canard that was widely shared and passed down during handovers, there had been a fire in the mid-90s. These staff did not feel that the files were really ‘ours’ to consult for search purposes.

2007 discussion of the disposition of the migrated archives

24. A train of emails from 2007 makes clear the uncertain status of the archives. But it also shows that there have been major exceptions to the general principle that these papers have been considered ‘out of bounds’. It is worth mentioning that I only came across this train because I found one of the messages on iRecords as an orphan HTML document at *S:\ITD\IMG\Records Management\Retrieval\ General \Finding Aids List*. From this IMG were able to recover the rest of the exchange from TNA.

25. The key exchanges were as follows:

- i) In August 2007 [REDACTED] sought confirmation from [REDACTED] that TNA still did not want the migrated archives.
- ii) [REDACTED] said there had been no change to TNA’s position. The files were not wanted by them as *“any significant material should be duplicates of the selected Colonial Office London HQ files. We are content for FCO to dispose of these records by destruction without further reference to TNA”* (my underlining).
- iii) On the strength of this, [REDACTED] to go ahead with destruction. But [REDACTED] objected on the grounds that the files contained much important material which was being quite regularly consulted, albeit on an ad hoc basis, and contained information not found in TNA. As examples she cited:
 - searches by the Research Analysts, mainly [REDACTED], who had regularly used the BIOT files in connection with the ongoing court cases concerning the Chagos Islanders and Diego Garcia.
 - review of the Basutoland files by two academics writing a book on “Medicine Murder in Colonial Lesotho”. They had known about the papers as they had been given a file list by the last Governor’s widow. They found so much new material that they had to rewrite their book.
 - information provided to BHC Mbabane on the founding of that capital.
 - an academic request for papers related to the New Hebrides for research into a particular cargo cult. [REDACTED] had reviewed the relevant files and sent him papers from them.

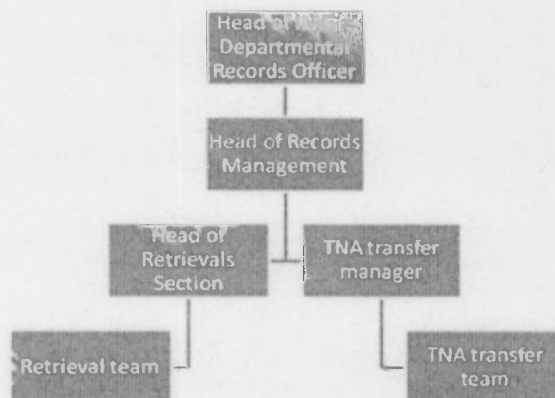
██████████

She also mentioned 5 boxes containing "files on the bombing of the King David Hotel" in Palestine.

██████████ went on to say that "I regularly check the file lists, when all other searches have failed just in case there is something in them" and recommended review of the files rather than destruction, with the object of finding a suitable home for the papers "where they would be available to the public for research purposes".

- iv) ██████████ passed this on to ██████████, as his boss, with the comment that destruction "may not be as straightforward as we hoped", particularly as some of the files (from BIOT) had been cited in court cases. ██████████ did not, it would seem, respond or take any further action, though he evidently decided, or went along with the view, that it would be wrong to proceed with destruction. [In answer to my enquiry about what action he took, he has responded: "I was on leave for two weeks at the time. I cannot recall after all the time that has passed. It would not have been high on my priorities as set out by my manager ██████████ which were to make sure the annual transfer deadlines were met, re-review done, and management of the budget."]
- v) ██████████ told TNA that she still thought the files were probably replicated within the National Archive "but sadly I think we are going to have to have a good look!! God only knows when and who!!"
- vi) In further exchanges within TNA ██████████ continued to resist acceptance of the material for the public record on the grounds that: "I don't doubt that there is info in the files not in the Colonial Office material... that we hold – but the selection decision is that we've taken from the London end anything we want, and other stuff in the Governor's files additional to that can be deemed not worth preserving in addition. There may of course be the odd case where there's valuable material that wasn't copied to London, but the effort of finding it is too great to justify the search." He went on to observe that: "if we don't want it, FCO is free to destroy it – but it does not have to. If FCO has an admin need to retain (e.g. the papers used in court) then it can", under Section 3(4) of the Public Records Act. Finally he observed that "If FCO is considering transferring the papers anywhere else to be open to researchers, they can, but then my strong view would be that they should **not** go to another UK repository. The reason for them not being left in the territory was that they were deemed too sensitive for whatever reason. If they are now releasable, and FCO sees merit in preservation rather than destruction, the proper course of action would be to arrange their return to the successor administration's national archive. This would of course require the Lord Chancellor's permission, but no doubt this would be forthcoming if FCO asked for it."
- vii) ██████████ of TNA communicated this "strong view" to ██████████, but I can find no record that the TNA view was submitted upwards, nor does it appear even to have been documented within IMG. ██████████ had entirely forgotten the exchange when I asked her about her understanding of the status and content of the migrated archives – and even now she maintains that she can only dimly recall it.

26. One notable feature of these exchanges is that they were concerned with big decisions of principle (involving possible destruction of thousands of migrated archive records) yet senior IMG managers were notably absent from the discussion. The organisational flow-chart was this:



██████████, was copied into the exchanges, yet I can find no record that he expressed a view. The substantive input seems to have been being made by more junior staff. Nor can I find evidence that anyone consulted ██████████ at the time. She has told me, indeed, that: *"I have no knowledge of these papers and do not recollect being consulted about them"*.

A 2009 TNA statement about the status of the migrated archives

27. In May 2009 ██████████ wanted additional storage space, and asked about the future of the migrated archives. ██████████ asked her to check with TNA whether they wanted the files. ██████████ of TNA responded to this informal approach that they still did not want the papers. He suggested that these *"should when it is possible be returned to the successor states' custody"* unless it emerged that *"part of the records was in fact... some other category of material that now constitutes UK public records worthy of permanent preservation"* – but as far as he knew there had been no analysis of the material.
28. ██████████ thinks she was told by ██████████ to leave the files where they were for the time being – or words to that effect. I asked ██████████, in retirement, whether he had had a game-plan in mind, and if so whether he had recorded his conclusions anywhere. He said he could not recall. He thinks he would have discussed it internally and consulted ██████████. His guess is that no further action was taken because (as usual) staff shortages precluded full analysis of the material, and there were more pressing priorities including other 'out of time' collections to catalogue and dispose of. But there is no audit trail to confirm that any decision was taken, or plan put in place, or that ██████████ was consulted.

29. With that introduction, I come to the particular questions that I have been asked to address:

Why were the Kenya files not identified at the time of the 2005 and 2006 FoI requests?

30. There were two 2005 requests.

- [REDACTED]
- The first was for “files from 1959 and after which might contain the personal report by Sir Evelyn Baring, then Governor of Kenya, to the Secretary of State about his discovery that they had both been duped by the Administration in Kenya over the extent of organised violence against detainees in the Mau Mau Emergency, and the subsequent discussion and decisions taken over what should now be done”. The response was signed by [REDACTED] on the basis of research conducted by [REDACTED]. [REDACTED] listed the TNA files to which the enquirer was eventually directed, with the comment that these were “the likeliest references I can find...I do not think there are relevant pieces in CO 967 among the private papers of Lennox Boyd...but as usual it is difficult to tell from the piece descriptions.” She thought the files on ‘correspondence with Sir E Baring’ and ‘Irregularities at the Hola Detention Camp’ were most likely to have what the enquirer was seeking “as the whole question arose following the revelations of deaths at Hola, according to Baring’s biography” ([REDACTED] “Mau Mau Emergency”) [file reference redacted]
 - The second was an email from a researcher who had found files in TNA that he thought probably relevant to his research into the Mau Mau, but which did not have descriptions on the catalogue. [REDACTED] informed [REDACTED] that none of the files he had cited was relevant as they concerned family affairs of the Kabaka of Buganda and the Aga Khan. She suggested informing the enquirer of this, while also assuring him that the FCO would re-review the files to discover whether they were now releasable. This is indeed the response that went out, together with confirmation that “by the end of today 21 of the files will have been sent to the National Archives at Kew for release to the public..”

31. This second request was very specific, and there was no need to consult the migrated archives. The first, by contrast, should perhaps have caused [REDACTED] and [REDACTED] to consider whether there might be relevant material there. Yet they never considered this possibility. I have spoken to [REDACTED] (now retired) about why this was. She responds, first, that they never routinely searched the migrated archives – though she recalls consulting them on a couple of occasions in relation to BIOT and also, she thinks, Nyasaland. Second, the enquirer had asked for reports from the Governor ‘to the Secretary of State’. If it *had* occurred to her to consult the migrated archives she would have assumed that correspondence with London would have been replicated on Colonial Office files held in the National Archive. Finally, she stresses that they were behind with the routine 30-year review work, and under extreme pressure to get back on track. She would not lightly have embarked on a difficult search that she had no reason to think was a critical one, and that would probably have turned out to be a wild goose chase.

32. The 2006 request was when Leigh Day filed their legal claim for alleged atrocities committed during the Emergency. Their letter of 11 October to the Secretary of State made reference to “a final tranche of documents relating to the suppression of the Mau Mau held by the Public Record Office” that the Government was “refusing to release”. IMG were asked whether they knew of such files. [REDACTED] responded that all files had been released to TNA, though we might not have made specific reference to all of them, because not all the

[REDACTED]

files were titled. [As no records have been retained at Hanslope Park – in accordance with Ministry of Justice Guidelines for the retention of case notes – I cannot say whether [REDACTED] or [REDACTED] approved this response, but so far as I can tell they did not intervene.] [REDACTED] of AD(E) pressed again, emphasising the gravity of the request as it involved a legal case against the FCO and an accusation that we were deliberately withholding files. She stressed that “we need to get to the bottom of what documents have been released and more importantly which, if any, are being withheld...Given that this case is likely to end up in the Courts with a large claim for damages being sought we need to make absolutely sure of our facts.” But on the basis of [REDACTED] initial response she thought that the focus of any further search should be the TNA, as the FCO had already released all the records that it held. She nevertheless sought an assurance in writing from [REDACTED], for audit purposes. Again, it is not clear whether more senior managers were consulted. Whether or not they were, it was [REDACTED] who again responded that: “We have had a search here and as far as we can see all papers have been released to TNA”. In FCO’s response to Leigh Day, this wording was strengthened to: “our records indicate that all information we held...has already been transferred to TNA”. The wording of Treasury Solicitors’ letter to Leigh Day a few months later was even less equivocal: “...all information held by the FCO relating to the emergency Period has been transferred to TNA and so is in the public domain.”

33. Why was there no interrogation of the Kenyan migrated archive? [REDACTED] tells me that:

- i) She had no reason to think that the migrated archive contained relevant material. She understood it to consist mainly of ephemeral papers, registers, etc – and believed that what was not administrative would be replicated in Colonial or Dominion Office papers in the TNA. [As noted at para 25 ii above this was also TNA’s view.] The fact that TNA did not want to accept the papers for the public record reinforced her belief that the papers were insubstantial.
- ii) She was unaware that the migrated archive contained file lists, and did not think it ‘searchable’.
- iii) The Leigh Day letter made reference to undisclosed documents that were “held by the Public Record Office”. Even had she thought of it, she says, this would have put her off the scent of the migrated archive, as the Public Record Office (TNA) was not holding these papers, and refused to do so.
- iv) Her section was very busy with other FoI work, and this was one request to which she thought she could respond quickly and easily because she could rely on [REDACTED] FoI response the year before. If [REDACTED], who had been her boss until very recently, had not considered the migrated archive relevant to the 2005 FoI request, [REDACTED] reasoned that it would not be relevant to this one. [She did not sufficiently weigh the far greater import and scope of the request with which she was now dealing. It was for a ‘tranche of documents relating to the suppression of the Mau Mau’ that HMG was ‘refusing to release’ for the purposes of a court case in which HMG might face a large claim for damages – whereas the 2005 request had been from an academic, and for a specific report. Court Disclosure of documents is a legal requirement covering all papers held, regardless of ownership.]

[REDACTED]

v) The archive was in Retrieval section rather than in 'her' area (paras 20-23 above).

vi) Finally, researches in the migrated archives were simply not part of the accepted procedure for handling requests for historical papers.

34. [REDACTED] says she now kicks herself for not thinking that the migrated archives might contain relevant material. Had she considered that even a possibility she says she would certainly have looked. What she vehemently maintains, and I accept, is that there was no deliberate intention to withhold information. She is a strong proponent of FoI, and is proud of the role she plays in releasing papers to those who request them.

35. The deeper problems, I suggest, were threefold:

- First, it had come to be understood that the migrated archives were unimportant and unsearchable. The migrated archives were being treated as just that – archives. The material was stored in large blocks by country and not physically subdivided according to any meaningful file-plan. The role of IMG Hanslope Park is not archive management in the true sense – all the records it holds are effectively in a state of transition even if that means they have to be retained for substantial periods – but this had been lost sight of in relation to the migrated archives. Furthermore, lack of process documentation had allowed a gradual degradation of collective memory of the migrated archives. There had been efforts over the years to overcome the general problem by preparing 'desk notes' on best retrieval practice and 'finding aids' for particular types of request, but they did not capture all the knowledge that was possessed by individuals. [REDACTED] until 2006, told me that she sometimes consulted the migrated archives. It is clear that at a more junior level [REDACTED] was doing so at the time of the 2005 and 2006 FoI requests, and even withdrawing papers from the archives to send to Research Analysts, for example. She tells me that *"I did not use anything from these files without getting permission from [REDACTED] or [REDACTED]. And any material used was sensitivity-reviewed first"* – so others should have shared her knowledge of the importance and potential relevance of the files. But she saw the archives as 'my pet' as she put it to me – like an esoteric hobby that others did not fully appreciate. A year after the 2006 FoI request, when there was talk of destroying the archives, she minuted that *"I regularly check the file lists, when all other searches have failed just in case there is something in them"* (para 25 iii above) yet she did not think to make this suggestion when [REDACTED] circulated draft 'desk notes' on finding aids, and nor did her superiors think to do so. Yet they should have understood the significance of the files.

[REDACTED] assures me that she went round the archives with everyone before she left at the end of 2008, and would certainly have mentioned the utility and relevance of the migrated archives for certain purposes, but [REDACTED], who overlapped with her for about two months, cannot recall being given such advice. [REDACTED] was not aware of the importance of the Kenyan archive in particular, but if she – or other more senior staff who should have understood the significance of the files – had suggested searches of the migrated archives as something to be

[REDACTED]

borne in mind when there were requests of particular gravity and which required the most exhaustive efforts, then others might have taken this step sooner in the Kenyan connection.

- Lack of process documentation and misunderstandings about the importance and searchability of the archives explain the failure only up to a point. I think it fair to say that these misapprehensions were only half believed, at least by the more thoughtful and knowledgeable staff. It was perhaps convenient to accept the assurances of predecessors that the migrated archives were administrative and/or ephemeral, and did not need to be consulted for the purposes of Fol requests, while also being conscious of the files as a sort of guilty secret, of uncertain status and in the 'too difficult' tray. As [REDACTED] put it to me: *"people tried to ignore the fact that we had them. We weren't really supposed to have them [as they were over 30-years old, yet neither transferred to the TNA nor covered by a Lord Chancellor's Instrument] so it was thought best to ignore them for the purposes of requests"* (telephone call on 9 February 2011).
- Finally, and most importantly, the drive and initiative about what to do about the migrated archives_ seems to have been coming from relatively junior staff. More senior management, and notably [REDACTED] at the time, as well as his line manager [REDACTED], appear to have been absent from the field, at least as seen through the patchy records. As noted (para 26 above) [REDACTED] says she has *"no knowledge of these papers and do not recollect being consulted about them"* – yet she was [REDACTED]. I do not doubt that both managers were dedicated to their jobs, working long hours and to a high standard [REDACTED]. But – like senior IMG staff over so many years – their attention was on other priorities, and especially the need to meet annual targets for the review and transfer of files to TNA. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Be that as it may, TNA felt that proposals they made later in 2009 for the modernisation of FCO records management processes (including a better audit-trail for file selection and destruction) were getting no FCO buy-in.

Why were the Kenya files not initially identified for the current legal case?

36. It is worth recording that the files have been identified in time to allow disclosure before the court case begins, and without necessitating a postponement. What has occurred is bad for the FCO's reputation, but we should not exacerbate our problems by too much breast-beating. Many of the same factors were at work that caused the earlier problems. In addition:

- [REDACTED]
- i) The [REDACTED], [REDACTED], initially asked Retrievals Section in IMG a very specific question: "how many files pertaining to the Mau Mau uprising (country file Kenya, both from London and BHC Nairobi) exist in the Archive?" This request for files "both from London and BHC" suggested that he was looking for post-independence files rather than for papers generated in Kenya during the colonial period (as indeed he was, as he had seen the 2006/7 exchanges with Leigh Day with their solid assurance that 'all information held by the FCO [relating to the period of the Emergency]...has been transferred to TNA'). That is how the request was framed, and that was how it was understood by [REDACTED], who led the search for IMG.
 - ii) This request was to Retrievals Section (which is concerned with papers 3-30 years old) rather than to the section concerned with historical searches. [REDACTED] reasonably protests that IMG's FAQs on the intranet directed him to steer his request in that direction, and that desk officers cannot be expected to understand the inner structures of IMG. But within Hanslope Park the direction and articulation of the request influenced the way in which it was understood and handled.
 - iii) The second wave of searches (in response to Leigh Day's Witness Statement) concentrated on two particular files pertaining to the destruction and preservation of pre-independence documents. These files were on the public record, but as 'closed files', retained by the FCO under a Lord Chancellor's Instrument. It quickly emerged that they were missing. Africa Department pressed for an exhaustive search for them, emphasising the gravity of the request, and it was indeed taken very seriously by Hanslope Park. [REDACTED] noted that according to TNA the files had been 'temporarily retained in 1997 for administrative purposes' but it seemed that the files had never been through the normal process, as they did not even have a box number in the FCO's Retained Archive. Having exhausted every avenue she could think of ([REDACTED] [REDACTED]) she concluded that they had perhaps never come to Hanslope Park at all when the FCO retained Archive had transferred from London in 2000. As a consequence, the focus of further extensive searches shifted elsewhere. It should perhaps have occurred to someone at Hanslope Park that files on 'destruction and preservation of pre-independence documents' relating to the Mau Mau could have been taken into the migrated archives by someone looking at papers from that era (and with hindsight the connection is all too clear) – but it would have required a particular leap of imagination. In addition, [REDACTED], was under particular work pressures – to which she had drawn attention in her mid-term report discussion – with only one B3 retrievals officer under her instead of two, and insistent demands to press ahead with work being directed by the iRecords Steering Group.
 - iv) While the searches for these files were going on, Professor Anderson submitted his Witness statement to Treasury Solicitors on 23 December. This alleged systematic withholding by HMG of 1500 files in 300 boxes taking up 100 linear feet. This was a

[REDACTED]

direct quote from the 1981 LRD chronology of the origin of the Kenyan migrated archive and subsequent action in connection with it (para 8 above) now on the public record – and hardly, therefore, good evidence of an intention to conceal. As soon as this Witness Statement reached Hanslope Park on 13 January this year staff there made the connection to the Kenyan migrated archive. That also brought to light the two missing retained files, which were sitting, loose, on top of the migrated archive file lists. [Even then, it is telling that [REDACTED], who first said “*Oh. He must be talking about the migrated archive*” – went on to say in the next breath “*but it won’t have any relevant papers...*”]

37. I can see why [REDACTED] feels let down by IMG. He had emphasised in ringing terms the importance of this particular search and the damage likely to be caused by a failure to disclose all papers (because it might feed allegations of conspiracy). He was forced to issue a second Witness Statement correcting his first, which was embarrassing for him and will be bad for the reputation of the FCO if it used as a stick with which to beat us. But I can also see, all too clearly, how the failure came about despite the best intentions of dedicated and professional staff at Hanslope Park. In the end, I judge that the fault was more with weak management and confusion over the status and handling of the migrated archives over many years than with lack of thoroughness by the staff engaged in this particular search.

Why does the content of the Kenya files (and the migrated archives as a whole) appear to have been unfamiliar to staff carrying out Fol enquiries?

38. I hope this is explained fully enough in my earlier account of the history of the migrated archives and their handling over the years. The uncertain ownership of the archives meant that they were never accorded the priority or resources required to review them comprehensively. Senior management should have seen the potential vulnerability (especially after the advent of Fol) and pressed for the resources required to review the papers – or at least applied for an exemption to render the FCO’s retention of the papers legally compliant. But they failed to do so. Insofar as some staff did have knowledge of the content of the archives – though not of the Kenyan papers in particular – there was a systemic failure of process documentation to ‘capture’ individual expertise for application by the Department as a whole.

Why have questions of ownership and disposal of the migrated archive not been resolved before now?

39. Again, I hope that this is adequately explained, if not excused, in the foregoing account.
40. TNA must take their share of the blame for the uncertainty, as they have blown hot and cold over the years. The initial assumption was that the migrated archives would end up on the public record, and Ministers were even advised to say so in Parliament if questioned (para 8 above). But TNA changed their minds. In 1982 the PRO said that the Aden files “*were not UK public records*” (para 9 above). At some point the Cyprus archive was given a public record catalogue number (para 13 above) which suggest that PRO intended to take it. Yet by the mid-1990s the FCO did not think PRO would accept the migrated archives, and this was confirmed in subsequent TNA reviews of FCO documentation performance. In 2007 the PRO Inspection Documentation Officer said he was content for FCO to dispose of the

[REDACTED]

records by destruction without further reference to TNA (para 25 ii). He went on to say, and confirmed as recently as 2009 that that if the FCO chose instead to transfer the papers elsewhere then, with the Lord Chancellor's permission, they should be returned to the successor administration's national archives (para 25 vi above). Yet the most recent statement I have from the TNA is that – though they recommend that the FCO should take legal advice in case of future difficulties – they now understand that “*the migrated archive contains public records*” and that as “*records of historical interest we are likely to select them for transfer to TNA*” ([REDACTED] email to me of 18 February).

41. But the blame also rests with FCO which failed, over many years, to muster the determination or the resources necessary for a full review of the papers. Without that, it was not possible to reach a definitive decision about their destiny.

A high-level action plan for ensuring that similar failings do not reoccur in the future

42. In his 2008-9 annual report on information risk management [REDACTED] noted, among the FCO's top five information risks: “*Lack of knowledge about the data or information that is held by the FCO including where it is held, why it is held, who has access to it, and how it is used.*” That vulnerability has indeed been exposed by subsequent events. So the first and most obvious recommendation must be:

- to conduct a full inventory of what the FCO holds, covering both paper and digital records, specifying what it is (in more than headline form, and ideally with an electronic subject index); where it is; who has access to it; and who has lead responsibility for it, especially for the purposes of disclosure requests. The review should cover all buildings and all holdings, including loose papers and any remaining archives held at post. The migrated archives saga reminds us that we cannot turn a blind eye to any of our holdings. All information held by the FCO should have been retained by choice rather than inertia, and must be effectively managed from a risk perspective. TNA have offered advice and support on how to draw up this inventory.
- This needs to be a ‘living document’, kept up to date, so that we do not again lose track of the status or content of our holdings.

43. As concerns ‘out of time’ records in particular (i.e. those which are over thirty years old, but not covered by a Lord Chancellor’s Instrument):

- Information Management Group, in agreement with TNA, should put together a management plan establishing a tight review schedule, and applying to the Lord Chancellor’s Advisory Council for coverage under an exceptional blanket Lord Chancellor’s Instrument (LCI) while this review takes place. TNA would incorporate the review into the Information Management Assessment Action Plan and monitor progress on that basis.

- [REDACTED]
- The first stage should comprise a full selection review on the basis of which TNA will decide what papers it wants for the public record.
 - Where TNA does require papers (which now applies, it would seem, to the entire migrated archive) the files need to be reviewed for sensitivity, redacted/closed as necessary, prepared and listed for transfer to the TNA.
 - Where TNA does not require papers, the FCO should either *continue to hold them* under an LCI exemption, *destroy* them, or – where it judges papers to be of historical interest – *sensitivity review* them before disposing of them elsewhere. [It should be noted that if papers end up in an ‘official place of deposit’, the FCO still retain some control over their release. Otherwise – eg if papers are offered to successor Governments or other institutions overseas – they pass out of FCO control entirely.]
- IMG should also agree a plan with TNA which addresses the requirement to re-review retained records every 10 years. I understand that, in order to secure renewal of the FCO’s authority to retain security- and intelligence-related records, the PUS will shortly be asked to give an assurance that arrangements for systematic re-review are in place. Re-review after 10 years would involve significant resources at a time when the FCO already faces a major challenge transitioning to the new 20-year rule for release of records. We should discuss with TNA and the Lord Chancellor’s Office whether there is room for flexibility in the application of this legal requirement.
 - IMG must be given the necessary resources to conduct all this urgent work. Quite apart from the transition from a 30-year to a 20-year rule, and even if the re-review challenge can be finessed, the need for a *first* review of other ‘out of time’ collections and loose papers is likely to require considerable additional resources. The FCO is reasonably well provided with selection reviewers. But IMG estimate that preparation of the migrated archive for transfer to TNA is likely to require three additional sensitivity reviewers over a two year period. There might be qualified staff – eg from the Corporate Pool – able to contribute to the work of review *support* teams (ie collating, weeding and rendering files searchable once they have left the sensitivity review process). But the sensitivity review process itself requires specialist staff. After a recent ‘near miss’ that would have caused serious reputational damage, the FCO has made strenuous efforts recently to tighten up in this area, including undertakings to [REDACTED] to apply an agreed job profile to the selection of sensitivity reviewers. It should also be noted that the sensitivity reviewers represent excellent value for money. Nevertheless, if cost constraints and the drive to reduce back office functions demanded a more radical approach, we might look again at a fundamental assumption of the current sensitivity review process that it aspires to risk *elimination* rather than risk *management*. If we were able to move towards risk management (even with a very low toleration of risk) we might find that there were academics, for example, ready to support our ‘out of time’ records review

[REDACTED]

work without pay as a contribution to their research and in the hope of being able to make use of some of the non-sensitive material in due course. The DRO, Head of Records Management and Chief Historian have all expressed strong reservations about this idea, for prudential reasons. But it seems to me that the FCO may be holding some collections that could be identified from the outset as highly unlikely to contain sensitive material and which could be given an amber light by sensitivity reviewers as a series without yet having been exhaustively reviewed. If subsequent review did reveal sensitive material, those papers would return to the sensitivity reviewers. Any qualified outsiders brought in for such a purpose would of course need security clearance as well as training in Fol exemptions, sensitivity criteria, etc. They would also need to sign undertakings not to disclose information unless and until authorised to do so by the sensitivity reviewers.

44. One difficulty with the present investigation has been the lack of 'case notes' relating to particular requests for information, since Ministry of Justice guidelines enjoin destruction of such notes after three years. Accordingly:

- IMG Records Management should continue its current efforts to move records management support processes (ie case notes) onto Firecrest, thereby retaining the output electronically. This would not only help with *post mortems*, should these be required, but it would accelerate subsequent searches going over similar ground. The Head of Corporate Records has commented that current operational priorities can make it difficult to develop and embed process change of this kind, and that the case for external consultancy should be considered.

45. Difficulties over the migrated archives are a microcosm of a wider problem, common to all large organisations, of keeping track of information held, and having the means to search it. "Information scattering" occurs not just with paper records, but electronic material in e-mails, in personal drives, on FCONet, on iRecords, on the MINERVA electronic archive system, and so on. The solution is partly technological because each electronic information repository in the FCO has such different capabilities, with higher-end (but still imperfect) search capabilities on the iRecords system and more basic search functionality – no better than an ordinary home PC – on shared drives. Accordingly:

- The FCO needs to invest in modern search technologies which are indifferent to the type of repository being interrogated and which can search across an entire organisation's holdings (known as 'enterprise search'). I understand that this is already a broad strategy objective of the Knowledge and Information Management Team in IMG but that project needs to be funded and carried forward.

46. The labelling of odd collections of 'out of time' papers might be more precise and descriptive, so that even staff not directly responsible for them at Hanslope Park become more alert to the possibility that they might be relevant to a disclosure request. Thus:

- The "Hayes Classified Archive" label on the stacks of migrated archives should be replaced by one referring to "Pre-independence papers returned from former

[REDACTED]

colonies". The individual country runs of boxes within the archive might also be given more descriptive titles (in the case of Kenya, for example: "*Executive Council minutes 1939-1957, War Council minutes 1954-1961, Council of Ministers' minutes 1954-1963, Intelligence Committee minutes 1953-1961, and Provincial and District Intelligence Summaries 1953-1961. Other pre-independence papers relating especially but not exclusively to the Emergency and the Mau Mau*").

- Space permitting, the migrated archives (especially once reviewed and weeded of duplicates of records held in the TNA or elsewhere) – should be re-attached, physically, to the main FCO Archive together with any other original records. This would encourage a more integrated approach to searching

47. The current division at Hanslope Park between "Retrieval" on the one hand, and "TNA Transfer and Historical Fol searches" on the other, has been too rigid, leading to gaps in coverage when information requests are lodged with IMG:

- One possibility, to plug such gaps, might be to restructure the sections so that they reflect a distinction between retrieval and transfer, rather than between records over and under 30 years old. Searches of the kind that caused the most recent difficulties would then be carried out by the Retrieval Section, even where these involved historical documents as well as more recent ones. At the least, the Retrieval and TNA Transfer/Historical Fol sections need to meet together regularly, for each to be aware of the holdings and processes of the other, and to discuss the handling of requests that straddle their responsibilities.
- The 'desk notes' and 'finding aids' need to be more comprehensive, including all holdings, and not only those which apply to routine requests.

48. In the most recent chapter of difficulties in unearthing all relevant holdings for the purposes of a disclosure request, part of the problem stemmed from misunderstandings between Africa Department and Hanslope Park. Africa Department was misled by the specificity of advice in IMG's FAQs on the intranet which suggests that all documents more than 30 years old are with TNA (from which IMG can order the files). This prompted the desk officer to request only post-independence documents. That, in turn, misled Hanslope Park, which should have been thinking about the FCO's own 'out of time' holdings of pre-independence documents. Accordingly:

- IMG should re-visit their guidance on FCONet to ensure that FCO enquirers understand the scope of holdings at Hanslope Park (including the possible relevance of 'out of time' holdings and retained files) and know how best to frame their requests.
- Departments should be encouraged to spell out as clearly as possible the context of requests, so that IMG – from its detailed knowledge of the FCO's holdings – can make the most informed judgement of which may be relevant. Consideration might be given to a *pro forma* request document, to avoid ambiguity.

- Retrieval staff at Hanslope should be formally trained in the conduct of "reference interviews" through which a customer's information requirements can be elicited.

49. Library and Records Department, and more recently IMG, have been responsible for maintaining high standards of documentation in FCO as a whole. They have set out guidelines for other Departments from time to time. But in the recent era they have signally failed to maintain their own documentation of process in any systematic way. The 2007 and 2009 email exchanges with TNA (paras 25-28 above) covered some critical ground in the present investigation, including a decision in principle to destroy the migrated archives as a whole, the staying of that decision, and a ruling from TNA that if the FCO wanted the migrated archives to be open to researchers the holdings should be given to the successor administrations' national archives rather than being retained in the UK. Yet there were no consequent decisions or actions, nor were these exchanges properly recorded. As another example, the incoming Head of Corporate Records explained to me how he had been unable to find papers on an agreement between the Cabinet Office, the MOD and the FCO on the early release of Falklands papers which was subsequently assessed to carry high diplomatic risk. Yet when he had asked one of the sensitivity reviewers for help he had been shown relevant papers, maintained in 'exquisite detail', stored on the reviewer's personal drive. To overcome this problem:

- IMG needs to re-establish a culture of effective record-keeping at Hanslope Park to maintain a coherent narrative of significant records management decisions. Progress has been made over the past year in documenting processes and in developing guidance on "what to keep", but this process is not yet complete. IMG must continue to embed good practice
- IMG staff, in line with FCO information management policy (of which IMG is the owner), should not hold work-related information on their personal drives.

50. This raises a more general concern about iRecords. I am struck by how well FCO paper files in the last century "told a story", and how much more difficult it seems to be these days to piece together a coherent reconstruction even of recent events. I realise that iRecords Steering Group and the Knowledge and Information Management Team in IMG are already overseeing work to improve the situation, but that effort has been too long delayed considering how long we have now had F3G. Speaking from my own recent experience, Ottawa was one of the last posts to get F3G, almost one year ago – so one might have expected a pretty slick conversion. Yet iRecords was not introduced onto the Canada network until some months after we had received F3G, and long after the trainers had departed. The iRecords training we were given was impenetrable (at least to me) and also largely theoretical, as iRecords was not operating on the training consoles. The advice we were given about which documents to register, how to tag them, where to place them etc, was frankly confusing. I still have little sense of who should register email trains, for example, or whether this should happen early in substantial exchanges, or as they conclude. The result is that practice within the Canada network is not coherent. We are in danger of reproducing the situation that prevailed with the earlier generation of Firecrest in which key documents were not being registered at all.

- [REDACTED]
- There needs to be a concerted push across the FCO as a whole to inculcate consistent iRecords practice, using the full potential of F3G, while we have the chance to achieve uniformity of practice, and before bad habits and divergent approaches take hold. I understand that efforts are already underway (through embedded Information Managers attached to DG cones), but the work needs to be prosecuted with even more urgency.
 - Good practice would be encouraged by introducing automated iRecords registration (as the iRecords Steering Group already intends, I understand). At present, though iRecords is a comparatively simple system it is still easier to save a document onto the shared drive or an e-mail into the Outlook folder structure. Registration should be the default, so that it becomes difficult to generate or circulate unregistered documents. The MINERVA system (containing legacy ARAMIS records) provides a good model because ARAMIS operated like a “virtual registry clerk” enforcing registration through its built-in electronic workflow.

51. Failure to disclose papers in good time for the Mau Mau court case has exposed the FCO’s vulnerability if it takes responsibility for papers, of whatever kind, that are not fully catalogued and searchable. Even where papers are searchable, we commit ourselves to a great deal of consequent work if we accept responsibility for them, because ownership carries duties of disclosure, not least in court proceedings. In consequence:

- The FCO needs to be more circumspect, in future, about taking possession of historic collections and other odd papers. We should only do so on the basis of cost/benefit analysis, fully conscious of the legal compliance obligations that follow. Once we do accept collections of papers, staff must be fully briefed on the FCO’s responsibility to disclose all relevant papers that it holds, regardless of ownership, in court proceedings.

52. Finally, a certain lack of grip – especially in the last decade or so – perhaps reflects poor levels of records training (and especially training in the management of ‘semi-active’ records treated as collections in transition to be selected, reviewed, transferred or destroyed). It may also have contributed to the phenomenon, noted for example in the 2007 exchanges (paras 24-26) that quite junior staff drove the discussion – for example with TNA – copying in more senior staff, but without receiving (and apparently scarcely expecting) input from their line managers. There is always the danger of creating a disengaged professional silo, and it is important that senior staff have general FCO experience and good political antennae as well as specialist skills. But information management has become a highly technical subject, so:

- I recommend that we maintain the practice now adopted (with [REDACTED] appointment) of having an information specialist in the Head of Records Management job.
- I further recommend that we consider having an information specialist at a strategic level (equivalent to the Cabinet Office’s Deputy Director Head of Knowledge and Information Management who oversees a strategy which “*aims*

[REDACTED]

to meet the modern and developing business and legislative need to capture and maintain the corporate memory in modern working technology, tools and media”). Ideally this should be at Board level, or in the Chief Information Officer slot. But failing that it might be helpful if the DRO/Head of IMG was an information specialist.

Anthony Cary

Anthony Cary

Cc: [REDACTED], IMG
[REDACTED], IMG
[REDACTED], IMG
[REDACTED], IMG
[REDACTED], IMG
[REDACTED], IMG
[REDACTED], Legal Advisors

FLAG A: TERMS OF REFERENCE

Requirement

To conduct a short investigation into the circumstances surrounding holdings of colonial administration files based at Hanslope Park.

Background

The FCO is currently engaged in a legal compensation case brought by former members of the Mau Mau movement in Kenya in the 1950s. The FCO gave an undertaking to the Court that it no longer holds any files relevant to the case. However it has subsequently come to light that there are 294 boxes of records from the former Kenyan colonial government at Hanslope Park, held there since the 1990s and previously at the joint FCO/MOD archives at Hayes. In addition, the FCO did not declare this material in response to Freedom of Information requests in 2005 and 2006 relating to the Mau Mau. The 2006 response stated specifically that the FCO no longer held any files relating to the Mau Mau.

Henry Bellingham, the Minister with responsibility for Africa, believes that this is a setback to the credibility of the Foreign Office and has instigated an urgent investigation into the circumstances surrounding these oversights.

The Kenya files (294 boxes or c1300 files) are part of a much wider collection of migrated files held by IMG at Hanslope Park. There are around 8,800 files in total covering former colonies such as Cyprus, Singapore, Malaya and Malta.

You will be required to:

- examine the reasons why the Kenya files were not identified at the time of the 2005 and 2006 FOI requests
- examine the reasons why the Kenya files were not initially identified for the current legal case
- assess why the content of the Kenya files (and the migrated archive as a whole) appear to have been unfamiliar to staff carrying out FOI enquiries
- assess the reasons why the questions of ownership and disposal of the migrated archive have not been resolved before now
- develop a high-level action plan for ensuring similar failings do not reoccur in the future

The circumstances around the failure to disclose material relevant to FOI requests are clearly a very sensitive issue for IMG Records Management (RMT) staff. The person who answered the 2006 FOI enquiry is still a member of the team. You will need to deploy tact and discretion in interviewing members of the team while ensuring the facts are clearly established. You will need to speak to a range of staff, not just those directly involved in the relevant FOI enquiries and you will also need to contact a retired member of staff who answered the 2005 enquiry.

You will report through Patrick Salmon, the Chief Historian, to Mr Bellingham.



You should have completed your report by 21 February to meet the Ministerial deadline of 28 February.

You will be located in either London or Hanslope, but will obviously need to spend time (at least a week) at Hanslope Park.