

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 7 October 2014

Public Authority: Staffordshire County Council
Address: Number 1 Staffordshire Place
Stafford
ST16 2LP

Decision (including any steps ordered)

1. The complainant submitted a request for copies of three separate audit reports concerning the following business areas: 'Contributions Policy for Adult Social Care', 'Data Protection' and 'Mental Health – Financial Management Arrangements'. The Council initially sought to rely on section 44 of FOIA to withhold this information. It subsequently argued that instead the 'Mental Health – Financial Management Arrangements' report was exempt from disclosure on the basis of sections 36, 38 and 43 of FOIA; that the 'Contributions Policy for Adult Social Care' report was exempt on the basis of sections 38 and 43; and that the 'Data Protection' report was exempt from disclosure on the basis of section 43.
2. The Commissioner accepts that section 36 is engaged. However, he has concluded that the public interest favours disclosing the 'Mental Health – Financial Management Arrangements' audit report. He has also concluded that sections 38 and 43 do not provide a basis to withhold any of the three requested reports. Furthermore, the Commissioner has concluded the Council breached section 17(1) when handling this request.
3. The Commissioner requires the public authority to take the following steps to ensure compliance with the legislation.
 - Provide the complainant with copies of the audit reports for 'Contributions Policy for Adult Social Care', 'Data Protection' and 'Mental Health – Financial Management Arrangements'.
4. The public authority must take these steps within 35 calendar days of the date of this decision notice. Failure to comply may result in the

Commissioner making written certification of this fact to the High Court pursuant to section 54 of the Act and may be dealt with as a contempt of court.

Request and response

5. The complainant submitted the following request to the Council on 12 July 2013:

'I am writing to request information under the Freedom of Information Act 2000. In order to assist you with this request, I am outlining my query as specifically as possible.'

'A copy of the Systems Audit reports into Contributions Policy for Adult Social Care, Data Protection and Mental Health – Financial Management Arrangements. These are referred to in the agenda for the Audit and Standards Committee meeting on 19 July.'

6. The Council responded on 30 September 2013 and explained that:

'The specific document is exempt from release under s44 [prohibition on disclosure] of the Freedom of Information Act 2000. Any information relating to this which can be made available to the public is done so via the audit committee webpages.'

7. The complainant contacted the Council on the same date and asked it to: *'please justify why the documents (more than one) are exempt from release under s44 of the Freedom of Information Act.'*
8. In response the Council explained that the relevant legislation which prohibited disclosure of the information was paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972 (LGA).
9. The complainant contacted the Council on 1 October 2013 and asked for an internal review to be undertaken into this decision. He argued that this particular provision of the LGA did not act as prohibition to disclosure under FOIA.
10. The Council acknowledged receipt of this internal review on 3 October 2013.
11. The Council informed the complainant of the outcome of the internal review on 27 March 2014. The review upheld the application of section 44 and also argued that the requested information was exempt from disclosure on the basis of section 43 of FOIA.

Scope of the case

12. The complainant initially contacted the Commissioner on 28 February 2014 as a result of the Council's failure to complete the internal review.
13. Following completion of the internal review, the complainant contacted the Commissioner on 31 March 2014. He explained that he disputed the Council's reliance on section 44 of FOIA to withhold the information he had requested. He also explained that he was dissatisfied with the Council's delay in responding to the request and its delay in conducting the internal review.
14. The Commissioner contacted the Council on 5 June 2014 and explained that in his view Schedule 12A of the LGA does not operate as a statutory bar to disclosure under FOIA. The Commissioner drew the Council's attention to a recent decision notice, also issued to the Council, which concerned a separate request which had been refused on the basis of section 44 of FOIA by virtue of paragraph 3 of Part 1 of Schedule 12A of the LGA. The decision notice concluded that section 44 did not apply.¹ In light of this the Commissioner asked the Council to reconsider its application of section 44 of FOIA to the complainant's request. He also asked the Council to provide him with a copy of the information requested by the complainant.
15. In response the Council provided the Commissioner with a copy of audit report for 'Mental Health – Financial Management Arrangements' and explained that it was no longer seeking to rely on section 44 to withhold this information. However, it explained that it considered it to be exempt from disclosure on the basis of sections 36, 38 and 43 of FOIA.
16. The Commissioner contacted the Council to explain that it had not provided him with a copy of the two other audit reports sought by this request, namely those into the following business areas: 'Contributions Policy for Adult Social Care' and 'Data Protection'.
17. In reply, the Council explained that it had always dealt with this request as seeking one report, i.e. the one concerning 'Mental Health – Financial Management Arrangements', which itself includes elements about the contribution policy and data protection. The Council explained that this interpretation had never been disputed by the complainant and in previous correspondence with him the Council had only ever referred to

¹ http://ico.org.uk/~media/documents/decisionnotices/2014/fs_50517099.ashx

the one report previously provided to the Commissioner. However, the Council explained that it had now considered the two further reports, copies of which it now provided to the Commissioner. The Council explained it considered both reports to also be exempt from disclosure on the basis of section 43 of FOIA with section 38 also providing a basis to withhold the report into 'Contributions Policy for Adult Social Care'.

Reasons for decision

Information in scope of case

18. Before considering the exemptions cited by the Council, the Commissioner wishes to confirm that in his view all three reports clearly fall within the scope of the complainant's request.

19. As noted above, the request sought:

*'A copy of the Systems Audit **reports** into Contributions Policy for Adult Social Care, Data Protection and Mental Health – Financial Management Arrangements. **These** are referred to in the agenda for the Audit and Standards Committee meeting on 19 July. (emphasis added)'*

20. In the Commissioner's view it is clear from the emphasised parts of the request that the complainant was seeking more than one report. Furthermore, the relevant part of the agenda report pack for the Audit and Standards Committee meeting of 19 July 2013 makes it clear that three separate reports existed.² It should also be noted that contrary to the Council's suggestion, the complainant did highlight to the Council that his request covered more than one report as his email of 30 September 2013 made clear: '*could you please justify why the documents (**more than one**) are exempt from release under s44 of the Freedom of Information Act'* (emphasis added).

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<http://modern.gov.staffordshire.gov.uk/documents/g4661/Public%20reports%20pack%2019th-Jul-2013%2010.00%20Audit%20and%20Standards%20Committee.pdf?T=10> – see page

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Audit report into 'Mental Health – Financial Management Arrangements'

21. The Council argued that this report was exempt from disclosure on the basis of sections 36(2)(c), 38 and 43.

Section 36 – effective conduct to public affairs

22. Section 36(2)(c) states that:

'Information to which this section applies is exempt information if, in the reasonable opinion of a qualified person, disclosure of the information under this Act-...

...(c) would otherwise prejudice, or would be likely otherwise to prejudice, the effective conduct of public affairs'

23. In this case, the Monitoring Officer for the Council provided the opinion in relation to the application of section 36(2)(c)). The Commissioner is satisfied that the Monitoring Officer is a qualified person for the purposes of section 36.
24. The qualified person's opinion explained that he considered that the disclosure 'would' result in prejudice to the effective conduct of public affairs. That is to say he believed that the exemption was engaged at the higher threshold rather than the lower one, i.e. that disclosure 'would be likely' result in the prejudice envisaged. The Commissioner has therefore considered whether the exemption is engaged at this higher threshold.
25. In determining whether this exemption is engaged the Commissioner must determine whether the qualified person's opinion was a reasonable one. In doing so the Commissioner has considered all of the relevant factors including:
- Whether the prejudice relates to the specific subsection of section 36(2) that is being claimed. If the prejudice envisaged is not related to the specific subsection the opinion is unlikely to be reasonable.
 - The nature of the information and the timing of the request, for example, whether the request concerns an important ongoing issue on which there needs to be a free and frank exchange of views or provision of advice.
 - The qualified person's knowledge of, or involvement in, the issue.
26. Further, in determining whether the opinion is a reasonable one, the Commissioner takes the approach that if the opinion is in accordance with reason and not irrational or absurd – in short, if it is an opinion that a reasonable person could hold – then it is reasonable. This is not the

same as saying that it is the only reasonable opinion that could be held on the subject. The qualified person's opinion is not rendered unreasonable simply because other people may have come to a different (and equally reasonable) conclusion. It is only not reasonable if it is an opinion that no reasonable person in the qualified person's position could hold. The qualified person's opinion does not have to be the most reasonable opinion that could be held; it only has to be a reasonable opinion.

27. In relation to the different thresholds of prejudice the Commissioner believes that the chance of prejudice occurring must be more than a hypothetical possibility; rather there must be a real and significant risk. With regard to the higher threshold, in the Commissioner's view 'would' means more likely than not' i.e. there is more than 50% chance of the disclosure causing the prejudice, even though it is not absolutely certain that it would do so. This limb therefore places a stronger evidential burden on the public authority to discharge.
28. Before considering the nature of the qualified person's opinion, some background regarding the report is necessary. In approximately 2008 the Council entered into a Section 75 Agreement with the South Staffordshire Foundation Trust (the Foundation Trust) for the provision of integrated care for those suffering from mental illnesses. Such agreements constitute statutory undertakings (under the National Health Service Act 2000) that are intended to articulate how partnership working between the local authority (as the statutory social care provider) and the NHS efficiently and effectively deliver an integrated service.
29. This report details the findings of an internal Council audit into the financial management arrangements between the Council and Foundation Trust in relation to this agreement. The findings of the report have not been shared with the Foundation Trust. At the time of the request the agreement was being renegotiated. The agenda of the Audit and Standards Committee 19 July 2013 confirmed that the audit had concluded that there was 'limited assurance' in relation to this area.
30. The qualified person advanced two reasons why section 36(2)(c) was engaged. Firstly, disclosure of the report would undermine the ongoing relationship between the Council and the Foundation Trust as well as the negotiations regarding a new section 75 agreement. In respect of the latter, it was suggested that both parties would wish to qualify and put into context the issues identified in the report which could polarise the positions of the two sides thus making the negotiations more difficult to conclude. In turn this could impact on the stability of the existing arrangements. This would be counter-productive to the purpose of the audit itself.

31. Secondly, the qualified person argued that disclosure would inhibit any public organisation from carrying out such an audit in the future.
32. With regard to the reasonableness of the opinion, the Commissioner accepts that the report contains a detailed and - in places critical assessment of the financial arrangements between the Council and the Foundation Trust regarding the provision of mental health services, hence the limited assurance status of the audit. Therefore, the Commissioner accepts that disclosure of this report could well undermine both the ongoing relationship between the two parties and in particular their negotiations regarding a new agreement for the reasons suggested by the Council. The Commissioner does not doubt that it is a reasonable opinion that such a possibility is more than a hypothetical one; rather it is one that presents a real and significant risk given the content of the audit and the ongoing nature of the negotiations. He is, however, somewhat sceptical as to whether the Council has advanced sufficiently detailed evidence to justify the higher threshold is necessarily met. Nevertheless, in considering the engagement of section 36, unlike other prejudice based exemptions, the Commissioner does not have to agree with the opinion, rather he simply has to find that it is an opinion that is not irrational or absurd. In these circumstances, the Commissioner accepts that it reasonable for the qualified person to argue that disclosure of this report would, rather than simply being likely to, prejudice the Council's ongoing relationship with the Foundation Trust in respect of the provision of mental health services, and in particular the negotiations surrounding a new section 75 agreement.
33. However, the Commissioner is not prepared to accept that the second argument advanced by the qualified person is a reasonable one. In the Commissioner's view the nature of the chilling effect envisaged - i.e. inhibition on *any* public authority's ability to carry out a similar audit in the future is so broad and so wide ranging that it is difficult to accept that such an opinion is one that is genuinely reasonable.

Public interest test

34. Section 36 is a qualified exemption and therefore the Commissioner must consider whether in all the circumstances of the case the public interest in maintaining the section 36(2)(c) outweighs the public interest in disclosing the 'Mental Health - Financial Management Arrangements' audit report.

Public interest arguments in favour of disclosing the information

35. The Council acknowledged that the public have an interest in how public money is spent on their behalf regarding the provision of services, a line of argument also advanced by the complainant.

Public interest arguments in favour of maintaining the exemption

36. The Council argued that it was clearly against the public interest for the provision of these services to be compromised either via an impact on the stability of the current arrangements or on the future provision of the services as a result of prejudice to the ongoing negotiations.
37. It also suggested that the structure and vocabulary of a formal audit report is potentially open to misinterpretation by the public. The report deals with governance arrangements rather than individual patient care; however, as a result of such a misinterpretation clients and relatives of the service users may be concerned about the provision of the service itself.

Balance of the public interest arguments

38. In considering complaints regarding section 36, where the Commissioner finds that the qualified person's opinion was reasonable, he will consider the weight of that opinion in applying the public interest test. This means that the Commissioner accepts that a reasonable opinion has been expressed that prejudice or inhibition would, or would be likely to, occur but he will go on to consider the severity, extent and frequency of that prejudice or inhibition in forming his own assessment of whether the public interest test dictates disclosure.
39. With regard to the public interest arguments in favour of maintaining the exemption, the Commissioner accepts that these cannot be dismissed lightly. It would clearly be against the public interest if the Council's relationship with the Foundation Trust in relation to the provision of these services was impaired be it either as result to the current working arrangements or indeed as a direct impact on the negotiations. However, as indicated above, the Commissioner is somewhat sceptical as to whether the extent of the severity and extent of that prejudice is one that really means that prejudice would occur, rather than simply being likely to. The Commissioner is of that view for two reasons; firstly the Council has not advanced any particular or specific evidence to support such a position; e.g. it has not specifically explained why particular parts of the audit report would be likely to polarise the two parties during the negotiations process. Nor has it specifically explained why the findings of the report would lead directly to an impact on the stability of current arrangements. Secondly, as is

clear by the 'limited assurance' finding of the audit itself there was clearly some concern from the Council's perspective as to the effectiveness of the existing governance arrangements. Moreover, the agenda factsheet highlights the 'control objectives' where assurance could not be provided. Therefore, to some extent, albeit a relatively generic one, the Foundation Trust is aware of some of the audit's findings in relation to the financial arrangements with the Council.

40. Furthermore, the Commissioner is not prepared to attribute any weight to the line of argument that the content of the audit report could be misinterpreted and thus lead to concerns amongst service users. In the Commissioner's view the Council would be able to publish the audit alongside an explanation to set the information into context in order to limit any damage caused by a potential misunderstanding.
41. With regard to the public interest arguments in favour of disclosure, the Commissioner agrees that there is clear interest in the public being informed about the manner in which public authorities provide services. In the particular circumstances of the case, disclosure of the withheld report would provide the public with a significant insight in the nature of the financial relationship between the Council and the Foundation Trust concerning the provision of mental health services. In the Commissioner's opinion this argument needs to be accorded significant weight given the limited assurance status of the audit's findings; the more specific findings of the audit; the levels of funding involved and number of users across the county who use the services.
42. Furthermore, the Commissioner recognises that the Council's primary argument focuses on the disclosure of this report being prejudicial to the going negotiations with the Foundation Trust. However, in his view there is a counter argument to such a position: the audit, albeit conducted internally by the Council, is clearly an objective and evidenced based one. Whilst the Council has used the findings to inform its negotiating position, it could well be argued that such discussions - and thus the operation of any new section agreement - may actually be improved if both parties were able to see and independently assess the findings of the audit.
43. In conclusion, given the limited weight in maintaining the exemption, and the significant public interest in disclosing the audit report, the Commissioner has concluded that public interest in maintaining the exemption does not outweigh the public interest in disclosing this audit report.

Section 38 – health and safety

44. The Council also argued that this report was also exempt from disclosure on the basis of section 38 of FOIA.

45. This section states that:

'(1) Information is exempt information if its disclosure under this Act would, or would be likely to.

(a) endanger the physical or mental health of any individual, or

(b) endanger the safety of any individual.'

46. The Council did not specify with sub-section it was seeking to rely on. Rather it simply argued that given the nature of some of comments in the report service users, their families and staff could be concerned about the quality and future of services. This was despite the fact that the report simply concerned finance and government arrangements rather than the quality of the services actually provided.

47. In order for a prejudice based exemption, such as section 38, to be engaged the Commissioner believes that three criteria must be met:

- Firstly, the actual harm which the public authority alleges would, or would be likely, to occur if the withheld information was disclosed has to relate to the applicable interests within the relevant exemption;
- Secondly, the public authority must be able to demonstrate that some causal relationship exists between the potential disclosure of the information being withheld and the prejudice which the exemption is designed to protect. Furthermore, the resultant prejudice which is alleged must be real, actual or of substance; and
- Thirdly, it is necessary to establish whether the level of likelihood of prejudice being relied upon by the public authority is met – ie, disclosure 'would be likely' to result in prejudice or disclosure 'would' result in prejudice. As explained above, in relation to the lower threshold the Commissioner believes that the chance of prejudice occurring must be more than a hypothetical possibility; rather there must be a real and significant risk. With regard to the higher threshold, in the Commissioner's view this places a stronger evidential burden on the public authority to discharge.

48. In the Commissioner's opinion Council's arguments fail to sufficiently explain why it believes that the potential 'concerns' that the parties it

identified may have as result of the report being disclosed are ones that are likely to endanger the physical or mental health of an individual or the safety of an individual. Consequently, the Commissioner is not satisfied that the first criterion is met and therefore this report is not exempt from disclosure on the basis of section 38(1) of FOIA.

Section 43(2) – commercial interests

49. Finally, the Council argued that this report was exempt from disclosure on the basis of section 43(2) which states that:

'Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).'

50. As this is a prejudice based exemption, the Council has to demonstrate that the three criteria set out above are met in order for the exemption to be engaged.
51. In its submissions to the Commissioner, the Council explained that this exemption was engaged because the commercial negotiation between it and the Foundation Trust in respect of a new section 75 agreement remained ongoing and elements of the report are relevant to the Council's negotiating position.
52. The Commissioner accepts that the nature of the prejudice envisaged by the Council is one that is relevant to section 43(2) and thus the first criterion is met. However, the Commissioner does not accept that the Council has demonstrated a clear causal relationship between the disclosure of the information and any potential prejudice to the Council's negotiating position. For example, it has not pointed to which particular parts of the report are relevant to the Council's position nor has it attempted to explain its rationale as to why disclosure of such parts could actually lead to the commercial interests of the Council potentially being harmed. Therefore, the Commissioner does not accept that the second criterion is met and therefore this report is not exempt from disclosure on the basis of section 43(2) of FOIA.
53. Accordingly, the Commissioner has concluded that the Council must provide the complainant with a copy of the system audit report into 'Mental Health – Financial Management Arrangements'.

Audit report into 'Adult Social Care – Contributions Policy'

54. The Council argued that this report was exempt from disclosure on the basis of sections 43 and 38 of FOIA.

55. Before considering the application of these exemptions, the Commissioner has briefly summarised the background to this particular audit:
56. The Council introduced its 'Partnership for Care' policy in August 2011 with the intention of sustaining good quality care services tailored to individual needs while making the best use of reduced budgets in a way which is fair to everyone.
57. In April 2012, a partnership arrangement was established between the Council and the Staffordshire and Stoke on Trent Partnership NHS Trust (the Partnership Trust) to provide integrated health and social care services for service users. The management of the charging functions, financial assessment and collection of income from service users forms part of the shared services provided to the Partnership Trust by the Council. The contributions process is initiated from referrals received from both the Partnership Trust and from the Council's Learning Disability/Mental Health Services. The audit reviewed the implementation of the Partnership for Care Policy and the systems in place for the assessment and collection of contributions.

Section 43 – commercial interests

58. In order to support its view that this report was exempt from disclosure on the basis of section 43(2), the Council emphasised the substantial commercial arrangement between the Council and the Partnership Trust regarding the provision of adult care services. It explained that the Council was in the process of re-negotiating this arrangement. The Council argued that the financial contributions aspect of these arrangements was commercially sensitive. It argued that as the report focuses on the internal workings of the financial and governance systems disclosure of such information would prejudice the Council's position in these negotiations.
59. With reference to the three criteria must be met in order for a prejudice based exemption to be engaged (see paragraph 47), the Commissioner is satisfied that the first criteria is met: the nature of the harm envisaged, i.e. prejudice to the Council's negotiating position is clearly one that falls within the scope of the exemption.
60. However, on the basis of the Council's submissions to him the Commissioner does not accept that the second criterion is met. This is because the Council has failed to demonstrate why disclosure of the report – and in particular the aspects of it concerning the financial and governance systems – could actually prejudice the Council's negotiating position. In other words, the Council has failed to explain the causal link

between disclosure of the information and the potential harm which the exemption is designed to protect.

61. Therefore, this report is not exempt from disclosure on the basis of section 43(2).

Section 38 – health and safety

62. In order to support its view that this report was exempt from disclosure on the basis of section 38 the Council explained that the report raised issues in respect of finance and governance arrangements. Although these does not necessarily relate to the quality of services provided, disclosure of the report could lead to concerns from both service users and their families. (The Commissioner notes that the Council did not specify which limb of section 38 it as seeking to rely on).
63. With reference to the three criteria set out above, once again in the Commissioner's opinion the Council's arguments fail to sufficiently explain why it believes that the potential concerns from services users and their families which may occur as result of the report being disclosed are ones that could actually engager the physical or mental health (section 38(1)(a)) or the safety of an individual (section 38(1)(b)). Therefore the Commissioner does not believe that the first criterion is met and thus this report is not exempt from disclosure on the basis of section 38 of FOIA.³
64. Consequently, the Council must provide the complainant with a copy of this audit report 'Adult Social Care – Contributions Policy'.

Audit report into 'Data Protection'

Section 43 – commercial interests

65. The Council only sought to rely on section 43(2) to withhold this information. This was on the basis that commercial arrangements exist between the Council and other authorities for the provision of data protection services. Disclosure of this audit report could prejudice the Council's ability to compete for data protection contracts offered by

³ For completeness, the Commissioner notes that the agenda report pack for the Audit and Standards Committee meeting of 19 July 2013 noted that the audit concluded that assurance could not be provided in relation to 9 separate control objectives, and the details of these are listed in the report pack. See page 10 of the pack:
<http://moderngov.staffordshire.gov.uk/documents/g4661/Public%20reports%20pack%2019th-Jul-2013%2010.00%20Audit%20and%20Standards%20Committee.pdf?T=10>

other authorities in the future. The Council elaborated on this line of argument. However, the Commissioner has not included these submissions here as they relate directly to the content of the audit. Rather, the Commissioner has discussed these submissions in a confidential annex which will be set to the Council only.

66. With reference to the three criteria set out above, the Commissioner is satisfied that the first criterion is clearly met, prejudice to the Council's commercial interests when bidding for future data protection work is clearly an interest which falls within the scope of the exemption. Furthermore, the Commissioner also accepts that the second criterion is met; he accepts it is plausible and logical to argue that disclosure of the content of an audit report that concludes that aspects of the Council's data protection work was only given a limited assurance has the potential to impact on the Council's ability to successfully secure external contracts for similar work in the future. However, the Commissioner is not persuaded that the likelihood of this prejudice occurring is one that is anything more than hypothetical and thus he does not accept that the third criterion is met. The Commissioner has elaborated on his basis for reaching this conclusion in the confidential annex.
67. Therefore, this report is not exempt from disclosure on the basis of section 43(2) and must be disclosed to the complainant.

Delays in responding to the request

68. Section 17(1) of FOIA requires a public authority to issue a refusal notice to a requestor stating the exemptions it is seeking to rely on, and if not clear, an explanation as why such exemptions apply. This notice must usually be issued within 20 working days of the request.
69. In this case the complainant submitted his request on 12 July 2013 but the Council did not issue its refusal notice until 30 September 2013, outside of the 20 working day time period. This constitutes a breach of section 17(1) of FOIA. Furthermore, by failing to cite in its refusal notice a number of exemptions upon which it later sought to rely, the Council committed a further breach of section 17(1) of FOIA.

Other matters

70. The complainant was dissatisfied with the amount of time it took the Council to complete its internal review. FOIA does not contain a statutory time within which such reviews must be completed. However, in the Commissioner's view most reviews should be completed within 20

working days and reviews in complex cases completed within 40 working days.

71. In the circumstances of this case the Commissioner understands that an administrative error occurred. Having received the complainant's request for an internal review on 1 October 2013 an investigation did take place and a response was drafted, however, the Council failed to send this to the complainant. The Commissioner expects the Council to ensure that such timescales are adhered to in the future.

Right of appeal

72. 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: 0300 1234504

Fax: 0870 739 5836

Email: GRC@hmcts.gsi.gov.uk

Website: www.justice.gov.uk/tribunals/general-regulatory-chamber

73. 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.
74. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed

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