

**Freedom of Information Act 2000 (FOIA)
Environmental Information Regulations 2004 (EIR)
Decision notice**

Date: 14 December 2015

Public Authority: Staffordshire Moorlands District Council
Address: Moorlands House
Stockwell Street
Leek
Staffordshire
ST13 6HQ

Decision (including any steps ordered)

1. The complainant submitted a request to Staffordshire Moorlands District Council (the Council) seeking information about a proposed development at Moneystone Quarry. The Council provided the complainant with some of the information falling within the scope of his request but sought to withhold the remainder on the basis of regulation 12(5)(f) (interests of the person who provided the information) of the EIR. The Commissioner has previously issued a decision notice ([FER0570512](#)) ordering the Council to disclose this information. Having done so, the complainant alleged that the Council would hold further information falling within the scope of his request.
2. During the course of the Commissioner's subsequent investigation of this further complaint, the Council located a small amount of further information and disclosed this to the complainant. It also located some further information and sought to withhold this on the basis of regulation 12(5)(f) of the EIR.
3. The Commissioner's decision is that:
 - On the balance of probabilities the Council does not hold any further information falling within the scope of the complainant's request beyond that located and disclosed in response to the previous decision notice; disclosed to the complainant during the course of this investigation; and the information it located during this

investigation which it is seeking to withhold on the basis of regulation 12(5)(f).

- The recently located information which the Council is seeking to withhold on the basis of regulation 12(5)(f) is exempt from disclosure on the basis of this exception and in all the circumstances of the case, the public interest favours maintaining the exception.

Request and response

4. The complainant submitted the following request to the Council on 2 June 2014:

'I refer to a meeting on Fri 30 May 2014 between Councillor Ralphs and Messers [names redacted] and submit the following Freedom of Information questions seeking information in relation to discussions between SMDC Officers and Laver Leisure regarding proposals for Moneystone Quarry.

- 1. What documents exist to evidence any meetings between Officers of SMDC and Laver Leisure and/or it's [sic] agents?*
 - 2. On what dates and at what venues did any such meetings take place?*
 - 3. Who was present?*
 - 4. What notes were taken and by whom?*
 - 5. After any such meetings 'at various levels' were notes of the meeting circulated, agreed and signed as a true and accurate record?*
 - 6. Did any/some/all documents contain the requirement that they were subject to 'commercial confidentiality'?*
5. After some delay, the Council responded to the request on 3 October 2014 and provided the complainant with the information which he sought.
6. The complainant contacted the Council on 30 October 2014 and submitted a further request in the following terms:

'I refer to my FOIA request of 02 June 2014 and your belated reply of 03 October 2014 shown below. It is now clear that those acting on behalf of Laver Leisure did not in fact seek to cover the contents of their pre-application discussions with 'commercial confidentiality'. As such I am clearly entitled to now see the material. It is also the case that some of the material (but not all) was placed before the Independent Inspector who heard the evidence in the authorities Core Strategy hearings in 2013. On that basis there can be no conceivable

reason for any of the material that formed any part of the Inspectors hearing not now be disclosed to me. Expressly I seek the material for the meeting dates:

*21 Oct 2010
15 Mar 2011
17 May 2011
10 Oct 2011
18 July 2012
16 April 2013*

Please also confirm that I may also attend in person to inspect the relevant file(s).'

7. The Council contacted the complainant again on 30 January 2015. It explained that Laver Leisure were content for the original scoping document that formed part of the pre-application discussions to be disclosed. They also agreed to the release of the documents dated 17 May 2011 and 21 October 2010, albeit with a number of redactions. These documents were provided to the complainant. However, the Council explained that the remaining information falling within the scope of the request was being withheld because Laver Leisure considered it to be confidential. The Council did not cite a specific exception within the EIR, or indeed a specific exemption within FOIA, as a basis upon which to withhold this information.

Scope of the case

8. The complainant originally contacted the Commissioner on 4 February 2015 to complain about the way his requests for information had been handled. He explained that he was dissatisfied with the time it took the Council to respond to both his request of 2 June 2014 and his further request of 30 October 2014. Furthermore he was dissatisfied with the Council's decision to withhold some information in response to his latter request.
9. During the course of his investigation the Commissioner established that the Council was seeking to rely on regulation 12(5)(f) (interests of person who provided the information) to withhold the information falling within the scope of the request of 30 October 2015 which it had located.
10. Having investigated this complaint, the Commissioner issued a decision notice on 28 July 2015. This notice found that regulation 12(5)(f) was not engaged in relation to the information that the Council had located and withheld in relation to the complainant's request of 30 October

2014. The notice therefore ordered the Council to provide the complainant with the information falling within the scope of the request dated 30 October 2014 which it previously withheld on the basis of regulation 12(5)(f).

11. The Council complied with this step on 27 August 2015.
12. However, the complainant contacted the Commissioner on 5 September 2015 and expressed his concerns that in his view the Council held further information which fell within the scope of his request of 30 October 2014 but such information had not been provided to him.
13. The Commissioner has undertaken steps to establish whether this is indeed the case. Having done so, the Council provided some further information to the complainant not previously located, sought to withhold further information on the basis of regulation 12(5)(f) – again information not previously located – and also argued that beyond these two classes of information, and the information previously disclosed in response to the previous decision notice, it did not hold any further information falling within the scope of the request.
14. This notice therefore considers two issues:
 - Firstly, whether the Council holds any further information falling within the scope of the request beyond that previously disclosed to the complainant (at whatever stage) and beyond that recently located information which it is seeking to withhold under regulation 12(5)(f).
 - Secondly, whether the Council can rely on regulation 12(5)(f) to withhold this recently located information.

Reasons for decision

Does the Council hold any further information falling within the scope of the request of 30 October 2014?

15. In circumstances such as this where there is some dispute between the amount of information located by a public authority and the amount of information that a complainant believes may be held, the Commissioner, following the lead of a number of First-tier Tribunal (Information Rights) decisions, applies the civil standard of the balance of probabilities.

16. In other words, in order to determine such complaints the he must decide whether on the balance of probabilities a public authority holds any further information which falls within the scope of the request.
17. In applying this test the ICO will consider:
- The scope, quality, thoroughness and results of the searches undertaken by the public authority when it located information relevant to the request; and/or
 - Other explanations offered as to why the information is not held.

Nature of concerns raised by the complainant and summary of further actions taken by the Council

18. When it initially considered the complainant's request the Council located the following information:
- Meeting of 21 October 2010 – Full typed minutes
 - Meeting of 15 March 2011 – Full typed minutes
 - Meeting of 17 May 2011 – Hand written notes taken by one attendee of the meeting
 - Meeting of 10 October 2011 - Hand written notes taken by one attendee of the meeting
 - Meeting of 18 July 2012 - Hand written notes taken by one attendee of the meeting
 - Meeting of 16 April 2013 – Typed minutes of meeting but marked as draft
19. As a result of the Commissioner's previous decision the complaint was provided with full copies of all of the documents described above.¹
20. In response to this disclosure the complainant contacted the Commissioner and alleged that the Council would hold further information falling within the scope of his request. More specifically, he argued that in relation to the information concerning the meetings of 17 May 2011, 10 October 2011 and 18 July 2012 he was unhappy with the fact that only handwritten notes taken by one attendee have been provided. He alleged that the Council would hold formal official minutes of these meetings and supporting correspondence/documentation relevant to these particular meetings.

¹ Some of the documents had in fact originally been provided to him, some had been disclosed in a redacted form and some had been withheld in full.

21. With regard to the typed notes of the meeting of 16 April 2013 that were provided, the complainant noted that these are marked as 'draft' and there is no indication as to whether they were adopted as the formal record of the meeting.
22. At this stage, the Commissioner contacted the Council about the complainant's concerns.
23. In response, the Council explained that when initially responding to the request in order to locate relevant information members of the Planning Validation team and the Principal Planning Officer personally reviewed all hard copy and electronic copies of information as held by the authority relating to the planning application. The Council explained that all information pertaining to a planning application would either be held in hard copy format as part of the case files or electronically on a central dedicated planning system computer drive.
24. However, in response to the complainant's concerns following the publication of the previous decision notice, the Council explained that a very detailed search had again taken place in order to locate information pertaining to the meetings of 17 May 2011, 10 October 2011 and 18 July 2012. As a result of these searches the Council explained that it could not locate anything relevant to the meeting of 17 May 2011.
25. It also explained that it had not located a record of the meeting of 16 April 2013 that was marked final.
26. However, the Council explained to the Commissioner that it did find further documents relevant to the meetings of 10 October 2011 and 18 July 2012. These documents were two emails sent by a Mrs Jane Curley of the Council, the first on 13 October 2011 and the second on 23 January 2013.
27. The Council explained to the Commissioner why these emails were not initially located. With regard to the email of 13 October 2011, the Council explained that although this email confirms the main points of the meeting, it was not immediately apparent that it related to the meeting of 10 October 2011 as this date is not in fact mentioned on the face of the email. With regard to the email of 23 January 2013, the Council explained that the date of the email and the time lag between it and meeting of 18 July 2012 meant that when the initial search had taken place this email was not related back to the meeting. The Council offered its apologies for not originally locating these two emails and provided copies of both to the complainant on 27 October 2015.
28. Having reviewed these two further emails, the Commissioner contacted the Council again to query the fact that in the penultimate paragraph of

the email dated 23 January 2013 Mrs Curley explains that she is attaching '*comments from Paul Armstrong who attended the meeting*'. The Commissioner asked to be provided with a copy of this attachment and clarification as to whether the Council would disclose this information to the complainant. In response, the Council argued that this attachment was exempt from disclosure under regulation 12(5)(f). It also provided the Commissioner with a copy of a Summary Report dated July 2011 submitted to the Council by the developers. The Council provided this document as it noted that Paul Armstrong's comments were partly based upon and referred to the Summary Report.²

29. Having received the further disclosure from the Council on 27 October 2015, the complainant contacted the Commissioner again on 30 October 2015 and raised a number of further specific points, namely:

- (a) Jane Curley's email of 23 January 2013 starts with the words 'Thank you for this'. Can this communication be provided?
- (b) Paragraph 4 of the email of 23 January 2013 refers to an email sent by Jane Curley on 7 February 2012. Can this email be provided?
- (c) Although the attachment to the email of 9 March 2011 has been provided, the email itself has not.
- (d) In the email of 13 October 2011 reference is made to a site visit that was due to take place. Did this take place and the notes be disclosed?
- (e) Why does the email of 13 October 2011 have the date '12/01/2012' printed on it?

The Commissioner's findings

30. With regard to the issues raised by the complainant in his letter to the Commissioner of 5 September 2015, having considered the Council's explanation of the searches it has undertaken for information relevant to the request, the Commissioner is satisfied that on the balance of probabilities it does not hold any further information regarding the meetings of 17 May 2011, 10 October 2011 and 18 July 2012 other than that previously located and disclosed to the complainant. Equally, the

² Whether these documents are exempt from disclosure is considered later in this notice.

Commissioner is also satisfied that on the balance of probabilities the Council does not hold a version of the meeting notes for the meeting of 16 April 2013 that are marked final.

31. In reaching these findings the Commissioner has taken into account the nature of the searches that the Council initially undertook when locating information relevant to the complainant's request. In his view, subject to the caveat discussed below, these do appear to have been reasonably thorough, conducted by members of staff who know the records in question well, and focused on the area of the Council where any relevant information is likely to have been stored and recorded. Furthermore, as a result of the concerns raised following the publication of the decision notice, the Council conducted a further detailed search which in the Commissioner's view adds credence to the finding that if any further information was held it would have now been located.
32. The Commissioner acknowledges that it could be argued that the Council's initial failure to locate the information disclosed to the complainant on 27 October 2015 demonstrates the flaws in its initial searches. To some extent the Commissioner accepts that this is a valid criticism. However, in the Commissioner's view the Council's explanation as to why each of the two emails was not initially considered relevant to the complainant's request is logical, even if that reasoning initially led it to overlook the information in question. In other words, in the Commissioner's opinion the Council's initial failure to recognise this information as relevant to the request does not fundamentally undermine the conclusion that no further relevant information is held concerning the meetings of 17 May 2011, 10 October 2011 and 18 July 2012.
33. Turning to the points raised by the complainant in his letter to the Commissioner of 30 October 2015, the Commissioner thinks that it is important to recall that the request sought information about six meetings which took place on particular dates. The request was not in so broad that it sought it encompass **all** material exchanged between the Council and the developer (or their representatives) in relation to Moneystone Quarry. In dealing with this complaint the Commissioner is limited to considering information that would fall within the scope of the request.
34. Consequently, in terms of the information sought at point (b) above, in the Commissioner's opinion it is sufficiently clear from the information that has been disclosed to the complainant that the email sent on 7 February 2012 is likely to have been exchanged between the parties as part of the ongoing pre-application discussions. There is no evidence, in the Commissioner's view, that such an email would relate directly to the meetings specified in the complainant's request.

35. Similarly, the Commissioner does not accept that there is a sufficiently clear link between the meeting of 10 October 2011 and the potential site visit later that month that brings information about that site visit – if indeed any is held by the Council – into the scope of the request. Rather, in the Commissioner's opinion, the site visit was part of ongoing pre-application discussions. Therefore, in the Commissioner's opinion, the Council are under no obligation to provide the information sought by point (d) above as a result of this request.
36. With regards to the information sought at points (a) and (c) the Commissioner asked the Council to provide him with a copy of these documents so that he could establish whether they fell within the scope of the request. The Council provided him with a copy of the email sought at point (a) but explained that despite a careful and extensive review of the file (including consideration of all e-mails held electronically), it could not locate the email sought by (c). In relation to the email sought at point (a), the Council argued that its opinion, this did not fall within the scope of the request.
37. The Commissioner has examined the email sought at point (a). He is also of the view that it falls outside of the complainant's request. This is because it does not relate specifically to the meetings identified in the complainant's request albeit that Mrs Curley's email of 23 January 2013 – which responds to the email sought by point (a) – does. Finally, with regard to point (e), in the Commissioner's view, the Council is not under any obligation, when responding to the complainant's request, to explain or clarify the nature of the information this disclosed. Rather the EIR simply obliges a public authority to disclose recorded information if it is held and not considered to be exempt under one of the exceptions.
38. In summary, the Commissioner is satisfied that, on the balance of probabilities, the Council does not hold any further information falling within the scope of the request of 30 October 2014 beyond that located and disclosed in response to the previous decision notice; disclosed to the complainant on 27 October 2015, and the recently located information which the Council is now seeking to withhold on the basis of regulation 12(5)(f).

Regulation 12(5)(f) – interests of the person who provided the information to the public authority

39. As explained previously, the Council is seeking to withhold the attachment to the email of 23 January 2013, along with a Summary Report provided by the developers, on the basis that it was exempt from disclosure on the basis of regulation 12(5)(f).
40. Regulation 12(5)(f) states that:

'a public authority may refuse to disclose information to the extent that its disclosure would adversely affect—

(f) the interests of the person who provided the information where that person—

(i) was not under, and could not have been put under, any legal obligation to supply it to that or any other public authority;

(ii) did not supply it in circumstances such that that or any other public authority is entitled apart from these Regulations to disclose it; and

(iii) has not consented to its disclosure'

41. In the Commissioner's view, the purpose of this exception is to protect the voluntary supply to public authorities of information that might not otherwise be made available to them. In such circumstances a public authority may refuse disclosure when it would adversely affect the interests of the information provider. The wording of the exception makes it clear that the adverse effect has to be to the person or organisation providing the information rather than to the public authority that holds the information.
42. With regards to engaging the exception, as recognised by the First –tier Tribunal (Information Rights), a four stage test has to be considered, namely:
- Would disclosure adversely affect the interests of the person who provided the information to the public authority?
 - Was the person under, or could they have been put under, any legal obligation to supply the information to the public authority?
 - Did the person supply the information in circumstances where the recipient public authority, or any other public authority, was entitled to disclose it apart from under the EIR?
 - Has the person supplying the information consented to its disclosure?³

Adverse effects on the interests of the person who voluntarily provided the information

43. As with all the exceptions in regulation 12(5), the threshold necessary to justify non-disclosure because of adverse effect is a high one. The effect

³ [John Kuschnir v Information Commissioner and Shropshire Council \(EA/2011/0273; 25 April 2012\)](#)

must be on the interests of the person who voluntarily provided the information and it must be adverse.

44. In considering whether there would be an adverse effect in the context of this exception, a public authority needs to identify harm to the third party's interests which is real, actual and of substance (ie more than trivial), and to explain why disclosure **would**, on the balance of probabilities, directly cause the harm.
45. There is no requirement for the adverse effect to be significant – the extent of the adverse effect would be reflected in the strength of arguments when considering the public interest test (ie once the application of the exception has been established). However, the public authority must be able to explain the causal link between disclosure and the adverse effect, as well as why it would occur. The need to point to specific harm and to explain why it is more probable than not that it would occur reflects the fact that this is a higher test than 'might adversely affect', which is why it requires a greater degree of certainty. It also means that it is not sufficient for a public authority to speculate on possible harm to a third party's interests.

The Council's position

46. The Commissioner asked the Council to explain why it considered this exception to be engaged. In response, the Council explained that the Summary Report was provided by the developer (Laver Leisure) on a voluntary basis to the Council as part of the pre-planning application stage. It also explained that Paul Armstrong's notes of the meeting drew heavily on this report. The Council explained that it would not have the right to require the organisation to provide this information to it as no formal planning application had been made by the developer at that time.
47. The Council emphasised that requests for pre-application advice are provided voluntarily by a developer in order to identify issues early enough so that these can then be taken into account in any formal planning applications which follow. Therefore information provided to the Council as part of pre-application requests/discussions are not planning applications and are not subject to the normal formal reporting/consultation of plans and development proposals as planning applications are. Consequently, the Council believed that in relation to the withheld information it would be not be able to disclose this information other than in response to a request made under the EIR or FOIA.
48. The Council explained that it had discussed the disclosure of these two documents with the developer. The developer explained that it was

firmly against disclosure of information relating to their pre-application discussions. More specifically, the developer submitted that:

'The application has not been determined. Disclosing emerging plans, environmental discussions and other areas that have changed as the pre-application meetings progressed will be used to confuse everyone. What should be in the public domain before an application is heard are the plans, statements and surveys that form part of the planning application. Areas that have changed and been refined will simply be confused by the publication of preliminary plans and information that are out of date.

Collectively all of the information being requested is commercially sensitive. At the pre-application stage we showed to [Council] officers our commercial plans for the leisure park and the various site layouts and content that were required for those commercial plans. Laver Leisure cannot move forward with the commercial development until planning consent has been obtained. However by releasing Laver Leisure's commercial intellectual property under a freedom of information request, Laver Leisure's competitors will have that information before Laver Leisure are able to use it.

We specifically obtained the agreement of the Council that our pre-application discussions would be kept commercially sensitive and not released under freedom of information requests. As a result we have showed Council Officers the full extent and detail of what we were proposing. The release of this information would fly against equity...

...If agreed confidential pre-application discussions are effectively released so they become part of the publicly available planning application in the long run up to a planning committee determination, where does that leave the current planning process? In our view it cannot in way it is intended to do'.

49. For its part, the Council emphasised that disclosure of these documents really would bring into question whether it was possible for parties to have confidential pre-application discussions with planning authorities.

The Commissioner's position

50. Given the context within which the Council was provided with the Summary Report by Laver Leisure, ie as part of pre-planning application discussions, the Commissioner is satisfied that the information was provided voluntarily. Furthermore, it is clear that the developer has not consented to the disclosure of the withheld information. Moreover, the Commissioner agrees with the Council's assessment that it was not entitled to disclose the withheld information apart from under the EIR.

With regard to Paul Armstrong's notes of the meeting, the Commissioner recognises that these were not provided to the Council but actually created by the Council. However, he is satisfied that they draw so directly on the content of the Summary Report (and indeed other information provided to the Council) that the notes could not be disclosed without revealing the content of information provided to the Council by the developer.

51. Consequently, the Commissioner is satisfied that the second, third and fourth criteria set out at paragraph 42 are met.
52. The Commissioner has given careful consideration as to whether the first criterion is met. He is, of course, conscious that in the earlier decision notice ([FER0570512](#)) he concluded that similar information could not be withheld on the basis of regulation 12(5)(f) precisely because the Council had failed to demonstrate that the first criterion was met. However, in the circumstances of this present complaint, the Commissioner accepts that the Council has presented a more persuasive and ultimately compelling case to support its view that disclosure would adversely affect the interests of the developer. In reaching this conclusion, the Commissioner notes that in its submissions regarding the previous case the developer had essentially just stated that disclosure of the withheld information would have harmed its commercial interests but not provided any explanation as to why this would have actually been the case. In contrast, in this case the developer has identified that its competitors could make use of the withheld information. Furthermore, the Commissioner accepts that the submissions in this case make a compelling case for how the candid and confidential nature of the pre-planning discussions are key to the developer in submitting a strong planning application, an outcome which is in and of itself vital the developer's commercial interests.
53. The Commissioner is therefore satisfied that the first criterion is met and that the Council can withhold this information on the basis of regulation 12(5)(f).

Public interest test

54. Regulation 12(5)(f) is a qualified exception and therefore the Commissioner must consider whether the public interest in maintaining the exception outweighs the public interest in disclosing the requested information.

Public interest arguments in favour of maintaining the exception

55. The Council argued that prior to the submissions of a planning application, developers should be able to seek informal advice without

disclosing their development plans to either their neighbours or their competitors.

56. It argued that if pre-planning advice was disclosed on a regular basis then there is no doubt that developers may decide not to engage with their Local Planning Authority at such an early stage. In the Council's opinion this would have a detrimental impact on the planning process possibly leading to the submission of inappropriate plans and proposals as part of the planning application with the likelihood that the planning process would be slowed down, costs increased and final decisions delayed. Indeed, the Council argued, it would potentially undermine the whole point of undertaking pre-application engagement as recommended in national planning guidance.
57. Furthermore, the Council also argued that it was against the public interest if disclosure of pre-planning application information were to harm the long term interests of a particular developer. It emphasised that in this case the developer had maintained the confidentiality of the information should be maintained on the grounds of commercial sensitivity.

Public interest arguments in favour of disclosing the information

58. In submitting his original complaint to the Commissioner, the complainant explained that following the publication of the draft Churnet Valley Master Plan (CVMP) he had noticed the inclusion of plan, not included in earlier drafts, which showed the intention that 250 holiday cottages were to be erected at Moneystone Quarry and further showed the positioning of those lodges. The complainant explained that he was concerned at the inclusion of such a plan because no determination had been made, at that time, as to any development of Moneystone Quarry and there had been no public consultation on the number or positioning of the lodges. The complainant noted that the CVMP was formally adopted by the Council in March 2014.
59. In October 2014 the developers submitted a planning application for the erection of a leisure complex at Moneystone Quarry, including the construction of a number of holiday cottages. The complainant explained that either directly or indirectly some but by no means all of the documentation that shaped this planning application had been placed into the public domain. However, he argued that he needed the further information he had requested on 30 October 2014 in order to determine the nature of the representations he wished to make about the planning application.

Balance of the public interest test

60. As a general principle, the Commissioner agrees with the position advanced by the Council that there is a clear public interest in it offering a pre-planning service so that formal planning applications, when submitted, can be dealt with more effectively and efficiently. The Commissioner agrees with the Council that it would be strongly against the public interest if the pre-planning application process was disturbed. This is a position the Commissioner has acknowledged in a number of other decisions notices which have involved requests for information associated with pre-planning discussions.
61. In the particular circumstances of this case, the Commissioner accepts that the information that has been withheld by the Council clearly reflect a candid discussion during the pre-planning process. The Commissioner therefore accepts that disclosure of this information would begin to undermine the confidential nature of the pre-planning process.
62. With regard to the public interest in disclosing the information, the Commissioner recognises that the proposed development at Moneystone Quarry has attracted a significant amount of local interest. He also accepts that disclosure of information associated with the pre-planning process would provide the public information with an insight into the Council and the developers' early discussions about this project. However, the Commissioner would question to the degree to which such information would be genuinely useful to the public; the nature of the planning permission process is that the application and documentation pertinent to it is placed into the public domain to allow interested parties to comment on it. In the Commissioner's view, disclosing information concerning the pre-planning process is not necessarily likely to be directly relevant to the planning application itself. In the circumstances of this case the Commissioner notes that the Summary Report dates from July 2011, some three years before the planning application was submitted, and the Council's comments on Report were made at a meeting which took place in July 2012. Therefore in the circumstances of this case, in the Commissioner's opinion, he believes that there is a limited public interest in disclosure of the withheld information.
64. Consequently, taking into account the weight that he believes should be attributed to public interest arguments in favour of withholding the information, the Commissioner has concluded that the public interest favours maintaining the exception.

Right of appeal

65. 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

66. 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.
67. 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

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