

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 4 October 2016

Public Authority: Ministry of Justice
Address: 102 Petty France
London
SW1H 9AJ

Decision (including any steps ordered)

1. The complainant requested information relating to the investigation into an allegation of legal aid fraud. The Ministry of Justice (MoJ) confirmed it held information within the scope of the request but refused to provide it citing sections 40(2) (personal information) and 31(1)(a) and (g) (law enforcement) of the FOIA.
2. The Commissioner's decision is that the MoJ correctly applied sections 40(2) and 31(1) of the FOIA. She requires no steps to be taken.

Background

3. The Legal Aid Agency (LAA) is an executive agency of the Ministry of Justice (MoJ) and falls within its remit for the purposes of the FOIA. The MoJ is therefore the appropriate public authority in this case.
4. On 8 June 2014, the complainant submitted a request for information to the MoJ. That request spanned multiple departments of the MoJ including the LAA. Parts of that request were repeated in a request for information dated 10 November 2015 – the request under consideration in this case.

5. The Counter Fraud Team is part of the LAA Special Investigations Unit. They are responsible for investigating allegations of fraud by providers (solicitors, third party experts and barristers)¹.
6. There was a LAA Counter Fraud Team investigation into whether there was sufficient evidence to support allegations made by the complainant which would justify referral to a prosecuting authority and/or a referral to a regulatory authority.
7. It is accepted that the complainant has been provided with some information outside of the FOIA as it related to his personal data and a subject access request.

Request and response

8. Following earlier correspondence between the two parties, the complainant wrote to the MoJ on 10 November 2015 and requested information in the following terms:

"a) A full breakdown of all legal aid claims made against my name by any solicitor firm/barrister within the last 6 years.

b) A full breakdown of all legal aid claims made against my name by any expert (forensic accountant, IT specialist) within the last 6 years.

c) Copies of any communication (email or other) with solicitors/barristers/experts and contract managers/LAA controllers.

d) LAA communication with any third party regarding above contracts or claims

e) Detailed documents and reports related to legal aid fraud investigation I requested against trial lawyers and expert.

f) All third party interest and communication related to legal aid fraud investigation against my lawyers and expert.

Requests 'c', 'd' and 'e' can be further broken down as follows;

¹ <https://www.gov.uk/guidance/legal-aid-agency-special-investigations#fraud-investigations>

- 1. Attendance notes for all meetings with me including dates and times – all stages 0-9.*
 - 2. Conference logs with [name redacted] and [name redacted] containing dates for all stages.*
 - 3. Date and time logs of reading prosecution exhibits for all stages (e.g. stage 1, task 4)*
 - 4. Copies of email communication with [name redacted] and the contract manager [name redacted] for all stages*
 - 5. List of suppliers [name redacted] contacted (logs) and any witness statements obtained (e.g. stage 13, task 13)*
 - 6. Communication/interview dates and times logs with my parents and staff in Sri Lanka (e.g. stage 3, task 14)*
 - 7. List of freight forwarders contacted, logs dates and times*
 - 8. Attendance notes of all prison visits by [names redacted] etc. with dates and times*
 - 9. Details about phone expert report (paid by the LAA) produced to court but never seen*
 - 10. Any other material relevant to claims made for stages 0-9”.*
9. The complainant emphasised that the request was about his case only and asked the MoJ to provide the information under section 7 of the DPA.
 10. The MoJ wrote to the complainant on 16 December 2015. The MoJ explained that while the request for information was made under section 7 of the Data Protection Act (DPA), information within the scope of parts (e) and (f) of the request did not constitute personal information the complainant was entitled to under that section. Rather it considered that those parts of the request for information fell within the scope of the FOIA and it had handled them accordingly.
 11. The MoJ refused to provide the information requested at points (e) and (f) of the request citing the following exemptions:
 - section 40(2) personal information; and
 - section 31 law enforcement.
 12. The MoJ provided an internal review on 23 February 2016 in which it maintained its original position, clarifying that it considers that the

sections of the FOIA that apply are sections 40(2), 31(1)(a) and 31(1)(g) by virtue of section 31(2)(a).

Scope of the case

13. The complainant contacted the Commissioner on 28 March 2016 to complain about the way his request for information had been handled.
14. He disagreed with the approach taken by the MoJ, arguing that his request should have been handled in its entirety under the DPA. He said that the request was made as a subject access request not a FOIA request, and that the information he is requesting relates to his case and legal aid claims about his case.
15. During the course of the Commissioner's investigation, the MoJ provided her with a copy of the disputed information. With respect to her consideration of the withheld information, the Commissioner's investigation has been assisted both by the summary provided by the MoJ setting out the information held in scope of the request and by the copy of the withheld information being annotated to show where the MoJ considers an exemption applies.

The approach taken by the Commissioner

16. With due consideration to her role as regulator, the Commissioner makes the following observations about the approach she has adopted in conducting her investigation into the complaint in this case:
 - given the amount of withheld information in this case, she has taken a proportionate approach, involving sampling of the withheld information;
 - she is satisfied that the sampling she has undertaken is representative of the withheld information;
 - she has considered the representations made to her by both parties;
 - she has challenged the arguments and evidence provided by the MoJ; and
 - she has reached her conclusion based on her assessment of all the circumstances.

17. The analysis below considers the MoJ's application of sections 40(2) and 31(1) of the FOIA to the withheld information within the scope of parts (e) and (f) of the request.

Reasons for decision

Section 40 personal information

18. Section 40(2) of the FOIA provides that information is exempt from disclosure if it is the personal data of an individual other than the requester and where one of the conditions listed in section 40(3) or 40(4) is satisfied.
19. In this case the relevant condition is contained in section 40(3)(a)(i). This applies where the disclosure of the information to any member of the public would contravene any of the principles of the Data Protection Act 1998 (DPA).
20. The first step for the Commissioner is to determine whether the withheld information constitutes personal data as defined by the DPA. If it is not personal data then section 40 cannot apply.
21. Secondly, and only if the Commissioner is satisfied that the requested information is personal data, she must establish whether disclosure of that data would breach any of the data protection principles under the DPA.

Is the information personal data?

22. Section 1 of the DPA defines personal data as:

" ...data which relate to a living individual who can be identified

a) from these data, or

b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intention of the data controller or any other person in respect of the individual."

23. The two main elements of personal data are that the information must 'relate' to a living person and that the person must be identifiable. Information will relate to a person if it is about them, linked to them, has some biographical significance for them, is used to inform decisions affecting them or has them as its main focus.

24. The MoJ confirmed that it considers that the withheld information in this case comprises the personal data of third parties. In support of its application of section 40(2), the MoJ told the complainant, for example, that:

"... the LAA applied that exemption on the basis that it was data that related to the personal information of third parties that the LAA held in relation to the investigation into the lawyers who represented you".

25. Similarly, the MoJ told the Commissioner that information held about its investigation into the complainant's allegations relates to individuals other than the complainant as it was used to inform or influence actions or decisions affecting those individuals. For the purpose of this decision notice, the Commissioner will refer to those individuals as 'the relevant professionals'.
26. In its submission to the Commissioner, the MoJ said that some of the withheld information comprises the personal information of the LAA staff responsible for determining if fraud had taken place. For the purpose of this decision notice, the Commissioner will refer to them as 'LAA staff'.
27. The Commissioner acknowledges that the information that the MoJ withheld by virtue of section 40(2) of the FOIA relates to the LAA's investigation into the lawyers who represented the complainant.
28. Having viewed the withheld information, and mindful of the context in which the information is held, the Commissioner is satisfied that the withheld information both identifies and relates to individuals other than the individual making the request. The information is, therefore, the personal data of those individuals - the relevant professionals and LAA staff - according to section 1(1) of the DPA.

Is the information sensitive personal data?

29. Sensitive personal data is defined in section 2 of the DPA. It is personal information which falls into one of the categories set out in section 2 of the DPA. In this case, the MoJ considers the following subsection applies:

"(g) the commission or alleged commission by him of any offence".

30. It told the Commissioner:

"MoJ considers that the withheld information constitutes sensitive personal data within the meaning of s.2 (g) DPA, as it relates to the alleged commission of an offence by the individuals involved ...".

31. The Commissioner acknowledges that the request in this case relates to the complainant's concerns about alleged legal aid fraud committed by the lawyers who represented him.
32. The Commissioner is satisfied that, given the nature of the information, the information withheld by virtue of section 40(2) constitutes information that falls within the definition of 'personal data' and that some of it falls within the definition of 'sensitive personal data'.

Would disclosure contravene one of the data protection principles?

33. The Commissioner must next consider whether disclosure would breach one of the data protection principles.
34. In this case, the Commissioner notes that the MoJ considers that disclosure would breach the first data protection principle. The Commissioner agrees that the first data protection principle is the most relevant in this case.

Would disclosure contravene the first data protection principle?

35. The first data protection principle states:

"Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless

(a) at least one of the conditions in Schedule 2 is met, and

(b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met."

36. In the case of an FOIA request, the personal data is processed when it is disclosed in response to the request. This means that the information can only be disclosed if to do so would be fair, lawful and would meet one of the DPA Schedule 2 conditions, and in this case one of the Schedule 3 conditions. If disclosure would fail to satisfy any one of these criteria, then the information is exempt from disclosure.
37. Under the first principle, the disclosure of the information must be fair to the data subject, but assessing fairness involves balancing their rights and freedoms against the legitimate interest in disclosure to the public.
38. In considering whether disclosure of personal information is fair the Commissioner takes into account the following factors:
 - the data subject's reasonable expectations of what would happen to their information;

- the consequences of disclosure (if it would cause any unnecessary or unjustified damage or distress to the individuals concerned); and
- the balance between the rights and freedoms of the data subjects and the legitimate interests of the public.

Reasonable expectations

39. In the Commissioner's view, a key issue to consider in assessing fairness is whether the individual concerned has a reasonable expectation that their information will not be disclosed. These expectations can be shaped by factors such as an individual's general expectation of privacy, whether the information relates to an individual in a professional capacity or to them as individuals and the purpose for which they provided their personal data.
40. In correspondence with the Commissioner, the MoJ accepted that the information sought relates to the public rather than private life of the individuals in question in that it relates to them in a professional capacity. It accepted that there is a greater expectation that the MoJ may disclose personal information when this relates to individuals in their professional life.
41. In relation to the third party information it held, the MoJ told the complainant:
- "I am satisfied that the individuals who could be identified through the release of this information have a reasonable expectation that their personal data would not be disclosed, because it was only provided for the purposes of the LAA's investigation"*
42. With respect to the personal data of its employees, the MoJ confirmed that where the LAA seeks to withhold such data, the staff involved are not of a level of seniority that they would have a reasonable expectation that their personal information would be disclosed.
43. The Commissioner recognises that people generally have an expectation that a public authority, in its role as a responsible data controller, will not disclose certain information and that it will respect their confidentiality.
44. In her view, individuals who are the subject of complaints have a reasonable expectation that information will be used for the purposes of that complaint only and will be treated confidentially. She therefore accepts that the relevant professionals would have had a reasonable expectation that the withheld information which constitutes their personal data, would not be disclosed to the public at large.

45. The Commissioner's guidance '*Requests for personal data about public authority employees*'² states:

"In assessing whether employees can have a reasonable expectation that their names will not be disclosed, key factors will include their level of seniority and responsibility and whether they have a public facing role where they represent the authority to the outside world".

46. In the circumstances of this case, the Commissioner is satisfied that the LAA staff would have had a reasonable expectation that the withheld information comprising their personal data would not be disclosed to the world at large.

Consequences of disclosure

47. As to the consequences of disclosure upon a data subject, the question – in respect of fairness - is whether disclosure would be likely to result in unwarranted damage or distress to that individual.
48. The MoJ told the complainant that disclosure of the requested information - for purposes other than those for which it was obtained - could cause unnecessary distress to the individuals concerned.
49. The Commissioner considers that disclosure in this case has the potential to cause damage and distress, particularly as she has found that disclosure of the information would not have been within the reasonable expectations of the individuals concerned.

Balancing the rights and freedoms of the data subject with the legitimate interests in disclosure

The legitimate public interest

50. Despite the reasonable expectations of individuals and the fact that damage or distress may result from disclosure, it may still be fair to provide the information if there is an overriding legitimate interest in disclosure to the public.

² https://ico.org.uk/media/for-organisations/documents/1187/section_40_requests_for_personal_data_about_employees.pdf

51. As disclosure under the FOIA is considered to be disclosure to the public at large and not to the individual applicant, the interest in disclosure must be a public interest, not the private interest of the individual requester. The requester's interests are only relevant in so far as they reflect a wider public interest.
52. There is always some legitimate public interest in the disclosure of any information held by public authorities. This is because disclosure of information helps to promote transparency and accountability amongst public authorities. This in turn may assist members of the public in understanding decisions taken by public authorities.
53. Arguing in favour of disclosure, the complainant made submissions in relation to his interest in this information being disclosed. The Commissioner acknowledges that the information at issue is of particular interest to the complainant. However she must consider whether or not it is appropriate for the requested information to be released to the general public.
54. In correspondence with the Commissioner, the MoJ acknowledged a level of public interest in legal aid expenditure in general:

"and specifically that the awarding of public funds takes place correctly and lawfully and that preventative and investigative measures exist to detect potential fraud".
55. The Commissioner recognises that there is a public interest in the MoJ demonstrating that it is fulfilling its functions efficiently and effectively. In that respect the Commissioner notes that the Counter Fraud Team, part of the LAA Special Investigations Unit, is responsible for investigating allegations of fraud by providers and, by extension, in addressing the public interest in matters concerning legal aid.

Would disclosure be fair? – the relevant professionals

56. Dealing first with the relevant professionals, the Commissioner is satisfied that those individuals would have no reasonable expectation that the information in question would be disclosed to the world at large and that the loss of privacy could cause unwarranted distress.
57. The Commissioner acknowledges that the information at issue is of particular interest to the complainant. However she has not seen any evidence to indicate that there is a sufficient wider legitimate public interest in this case which would outweigh the rights and freedoms of the data subjects and support further disclosure.
58. Therefore, disclosure would be unfair and would breach the first data protection principle.

59. As the Commissioner has concluded that the disclosure of this information would be unfair, she has not gone on to consider whether there is a Schedule 2 or Schedule 3 condition for processing the information in question.
60. As the Commissioner is satisfied that disclosure would breach the first data protection principle she upholds the MoJ's application of the exemption provided by section 40(2) of the FOIA to the information relating to the relevant professionals.

Would disclosure be fair? – LAA staff

61. Dealing next with the LAA staff, having considered the circumstances of this case, the Commissioner has concluded that releasing the withheld information would not be within the expectations of the LAA staff.
62. She is also satisfied that there is no legitimate public interest in disclosure which would outweigh any detriment which might be caused to the data subjects as a result of disclosure of the requested information.
63. Therefore, disclosure would be unfair and would breach the first data protection principle.
64. As a result she considers the exemption has been correctly applied in relation to the information relating to the LAA staff.

Section 31 law enforcement

65. Section 31 provides a prejudice based exemption which protects a variety of law enforcement interests. That means that, in order to engage the exemption, there must be a likelihood that disclosure would cause prejudice to the interest that the exemption protects.
66. During the Commissioner's investigation, the MoJ confirmed that it considers that sections 31(1)(a) and 31(1)(g) by virtue of sections 31(2)(a) and (b) apply in this case.
67. These sections provide exemptions where disclosure of the requested information would, or would be likely to, prejudice the exercise by any public authority of its functions for the purpose of ascertaining whether any person has failed to comply with the law or ascertaining whether any person is responsible for any conduct which is improper.
68. Consideration of these exemptions involves two stages. First, the exemptions must be engaged as prejudice relevant to the processes described in these sections would be at least likely to result through disclosure. Secondly, these exemptions are qualified by the public

interest, which means that if the public interest in the maintenance of the exemptions does not outweigh the public interest in disclosure, the information must be disclosed.

69. The MoJ has relied on the same reasoning for the citing of all of these exemptions and so they are covered jointly here.

Functions for a specified purpose

70. The Commissioner has issued guidance on section 31 of the FOIA³ in which she observes that the first five exemptions listed under section 31(2) all include the term 'ascertaining'. In that respect, her guidance states:

"To 'ascertain' is to make certain or prove. In this context it means that the public authority with the function must have the power to determine the matter in hand with some certainty. The public authority must not only be responsible for the investigation but it must also have the authority to make a formal decision as to whether that person has complied with the law. This could include taking direct action itself such as revoking licences or imposing fines, or it could involve taking a formal decision to prosecute an offender".

71. In this case, the MoJ advised the Commissioner that it is citing 31(1)(g) by virtue of 31(2)(a) and (b) - the purpose of ascertaining whether any person has failed to comply with the law and the purpose of ascertaining whether any person is responsible for any conduct which is improper respectively.
72. Regarding its application of section 31(1)(g), the MoJ considers that disclosure of any information that would prejudice its ability to perform its functions would engage the exemption. It explained that section 36 of the Legal Aid, Sentencing and Punishment of Offenders Act (LASPO) sets out the offence of false representation within the context of the legal aid scheme and that Part 1 of LASPO devolves the provision of legal aid services to the Director of Legal Aid Casework who is represented in the form of his staff at the LAA:

"The LAA is therefore entrusted with a function to fulfil, as is required in order to rely on s.31(2) FOIA. That function is to

³ <https://ico.org.uk/media/for-organisations/documents/1207/law-enforcement-foi-section-31.pdf>

determine if claims received from legal aid providers constitute misrepresentation, or if they are in breach of the terms set out in the Contract Standard Terms or other applicable contractual provisions. Accordingly, the requirements under s.31(1)(g) FOIA are satisfied, thus permitting s.31(2) (a) and (b) FOIA to apply to this information”.

73. The Commissioner is satisfied that part of the MoJ's functions include investigating complaints that may be relevant to sections 31(2)(a) and (b), provided the prejudice envisaged would or would be likely to arise.
74. Consideration of the section 31 exemption involves two stages. First, in order to be engaged, the following criteria must be met:
- 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 subsection;
 - 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 and of substance; and
 - it is necessary to establish whether the level of likelihood of prejudice being relied upon by the public authority is met - whether disclosure 'would be likely' to result in prejudice or disclosure 'would' result in prejudice.
75. Secondly, the section 31 exemption is qualified by the public interest, which means that, once the exemption has been engaged on the basis of the prejudice test, the information must be disclosed if the public interest in the maintenance of the exemption does not outweigh the public interest in disclosure.
76. Covering first whether the exemptions are engaged, in order for the Commissioner to accept that prejudice would be likely to result, there must be a real and significant chance of prejudice occurring, rather than this being of remote likelihood. The question here is, therefore, whether disclosure of the information in question would result in a real and significant chance of prejudice relevant to the exemptions cited by the MoJ.

The prejudice test

77. The Commissioner considers that the prejudice test is not a weak test, and a public authority must be able to point to prejudice which is 'real,

actual and of substance'. If the consequences of disclosure would be trivial or insignificant, there is no prejudice.

78. She also considers that the authority must be able to show how the disclosure of the specific information requested would, or would be likely to, lead to the prejudice. If the authority cannot show that the prejudice would or would be likely to occur, then the exemption is not engaged.
79. The withheld information in this case comprises information relating to allegations the complainant had made regarding the lawyers who represented him.

Applicable interests

80. The relevant applicable interests listed in this exemption are '*the prevention and detection of crime*', '*ascertaining whether any person has failed to comply with the law*' and '*ascertaining whether any person is responsible for any conduct which is improper*' respectively.

The nature of the prejudice

81. Next, the Commissioner has considered whether there would be a causal relationship between disclosure and the prejudice which the exemption is designed to protect against. She has also looked at whether the resultant prejudice which is alleged is real, actual and of substance.
82. The MoJ explained that the LAA has a duty to ensure that no fraud is being committed on the legal aid fund and that release of the requested information could reveal the Counter Fraud Team's investigation process. In the MoJ's view, such a disclosure may make it easier for individuals to evade detection.
83. Furthermore, in the MoJ's view:

"The importance of keeping details of investigations confidential is self-evident".

The likelihood of prejudice

84. In its correspondence with the complainant and its submission to the Commissioner, the MoJ variously used the terms "would be likely" and "could be prejudiced".

Would disclosure be likely to prejudice law enforcement?

85. In considering whether the MoJ has a function for any of the purposes listed in subsection (2), the Commissioner has taken account of its argument that the basis for engaging the exemption is the prejudice to its statutory function to investigate matters in accordance with LASPO.

The Commissioner accepts that the ability of the MoJ to comply with its statutory duties is clearly an applicable interest falling within the scope of section 31(1)(g).

86. Having considered the withheld information, she is satisfied that it relates to the applicable interests.
87. With regard to the second criterion, the Commissioner accepts that there is a clear causal link between disclosure and the prejudicial outcome covered by the exemption. The Commissioner acknowledges that the withheld information relates to an investigation into allegations of legal aid fraud.
88. Having considered the nature of the prejudice that could occur, the Commissioner is satisfied that this would clearly have been real and of substance.
89. As the Commissioner accepts that the outcome of disclosure predicted by the public authority would be likely to occur she finds that the exemption provided by section 31(1)(g) in conjunction with section 31(2)(a) and (b) is engaged.

The public interest test

90. Section 31 is a qualified exemption and therefore the Commissioner must consider whether, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

Public interest arguments in favour of disclosing the requested information

91. The complainant told the MoJ that the purpose of his request is to prevent or detect crime.
92. The MoJ acknowledged that release of the information would be in keeping with the Government's commitment to promote accountability and transparency relating to decisions taken by public bodies.
93. It acknowledged a general legitimate public interest in the provision of legal aid, and the procedures which exist to investigate and tackle fraud.
94. It also recognised that disclosure would provide a wider understanding of the expenditure of public funds.
95. The Commissioner accepts that the public interest can cover a wide range of values and principles relating to the public good or what is in the best interests of society, including those identified by the MoJ above.

Public interest arguments in favour of maintaining the exemption

96. In support of maintaining the exemption, the MoJ said that disclosure could reveal the working practices of the Counter Fraud Team which could result in any future fraudulent activity being more difficult to detect.
97. It also argued that third parties may be less willing to report fraudulent activity to the LAA if there is the possibility that details of the investigation will be disclosed to the world at large.
98. In its submission to the Commissioner, the MoJ argued that there is a significant degree of public interest in the MoJ being able to conduct confidential counter-fraud investigations:

"so as to more effectively detect and combat dishonest behaviour".

99. The MoJ told her that the LAA publicises details of counter-fraud activity:

"when it considers that dissemination of such information would be in the public interest, and would not compromise any related investigation".

Balance of the public interest arguments

100. The Commissioner has considered the public interest arguments put forward by both parties, including the public interest in transparency.
101. In her view, there will always be a public interest in disclosing information which allows scrutiny of how public authorities, such as the MoJ, operate and how well they serve the public in carrying out their statutory functions.
102. In that respect, the Commissioner has taken into account that the public interest is satisfied to some extent by the disclosure of information at the end of a counter-fraud investigation.
103. The Commissioner also acknowledges that the LAA's Counter Fraud team is responsible for safeguarding public funds against fraudulent activities. In that respect she considers that appropriate weight must be given to the public interest inherent in the exemption – that is the public interest in avoiding likely prejudice to the MoJ's ability to prevent or detect crime and to ascertain whether anyone has failed to comply with the law or whether anyone is responsible for improper conduct. The Commissioner considers that it is clear that there is a substantial public interest in avoiding that prejudice and that this is a strong public interest factor in favour of maintaining the exemption.

104. In all the circumstances of the case, the Commissioner has concluded that the public interest in maintaining the exemption provided by section 31(1)(g) in conjunction with sections 31(2)(a) and (b) outweighs the public interest in disclosure. In reaching this view she has given particular weight to the public interest in protecting the ability of the LAA to carry out official investigations for example into suspected dishonesty and fraudulent activity.

105. The MoJ was therefore not obliged to disclose the withheld information.

Right of appeal

106. 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

107. 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.

108. 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

Jon Manners
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