

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

Decision notice

Date: 15 February 2017

Public Authority: London Borough of Hammersmith and Fulham

Address: Hammersmith Town Hall
King Street
London
W6 9JU

Decision (including any steps ordered)

1. The complainant requested information connected to a specific planning application. The London Borough of Hammersmith and Fulham ("the Council") provided some information and withheld other information under the exceptions in regulation 12(5)(f) and 13 of the EIR.
2. The Commissioner's decision is that the Council has incorrectly applied regulations 12(5)(f) and 13 to most of the information that it has withheld. She has also decided that it breached regulation 7(1) in extending the time to respond to the request and regulation 11(4) in taking more than 40 working days to complete the internal review.
3. The Commissioner requires the public authority to take the following steps to ensure compliance with the legislation.
 - To disclose to the complainant all of the information that it has withheld except for:
 - (i) the name of an officer which was withheld under regulation 13;
 - (ii) the email address of the applicant's agent which was withheld under regulation 13; and
 - (iii) the applicant's email address and telephone number, the name and email address of the Construction Works Site Manager and the final paragraph of the complainant's email to the Council

of 5 July 2015, all of which the complainant has confirmed are outside the scope of his complaint.

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. On 24 November 2015 the complainant requested the following information under the EIR:

"I wish to be provided with notes of meetings, site visits, photographs, internal and external consultations, file notes, notes of telephone conversations and any correspondence relating to the following planning applications:

2014/01970/FUL

2014/05771/NMAT

2014/06100/VAR

In the case of 2014/05771/NMAT I wish to see the application form submitted by the applicant."

6. The Council responded on 22 December 2015 and explained that it required an extension to the 20 working day limit under regulation 7(1) of the EIR due to the request being assessed as complex and voluminous.
7. On 23 January 2016, the Council sent a response. It provided some information within the scope of the request but refused to provide the remainder. It cited regulation 13 as its basis for withholding information.
8. The complainant requested an internal review on 1 March 2016. The Council explained that due to a fault in its systems it was not aware of the complainant's request for an internal review until it was contacted by the ICO.
9. The Council provided the outcome of its internal review on 10 June 2016. It disclosed further information to the complainant but continued to withhold some information under regulations 12(5)(f) and 13.

Scope of the case

10. The complainant contacted the Commissioner on 29 June 2016 to complain about the way his request for information had been handled. He specifically complained about the delay in the Council providing its initial response and its refusal to provide all of the information that he requested.
11. During the course of the Commissioner's investigation, the complainant confirmed that he was not seeking to obtain the following withheld:
 - (a) the applicant's email address and telephone number;
 - (b) the name and email address of the Construction Works Site Manager (which was different to the Planning Agent); and
 - (c) the final paragraph of the applicant's email to the Council of 5 July 2015.
12. The Commissioner considered whether:
 - (i) the Council was entitled to rely on regulations 12(5)(f) and 13 to withhold its correspondence with the applicant and the applicant's agent;
 - (ii) the Council was entitled to rely on regulation 13 to withhold the name and address of the applicant in some correspondence, the email address of the applicant's agent and the names and contact details of Council officers in correspondence with the applicant and the applicant's agent;
 - (iii) it was reasonable for the Council to extend the time for its response under regulation 7(1); and
 - (iv) the Council complied with regulation 11(4) in the time that it took to notify the complainant of the outcome of the internal review.

Reasons for decision

Exceptions

Regulation 12(5)(f) – Adverse affect on the interests of the information provider

13. The Council withheld under the exception in regulation 12(5)(f) an email sent by the applicant on 5 July 2015.

14. Regulation 12(5)(f) provides an exception where 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;”

15. The Commissioner's guidance on regulation 12(5)(f) states that:

*“The exception can be broken down into a five-stage test, as recognised by the Information Rights Tribunal in *John Kuschnir v Information Commissioner and Shropshire Council* (EA/2011/0273; 25 April 2012):*

- 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?*
- Does the public interest in maintaining the exception outweigh that in disclosure?” (para 20)*

16. The Commissioner has considered the Council's arguments in relation to the application of the exceptions in regulation 12(5)(f) in a confidential annex attached to this notice. This is in light of the Council's view that the disclosure of some of its arguments would provide details of the

information that it is seeking to withhold under this exception. A copy of the confidential annex has been provided to the Council but not to the complainant.

17. As set out in the confidential annex, the Commissioner has determined that regulation 12(5)(f) is not applicable to the information that the Council withheld under that exception as she is not satisfied that disclosure would have an adverse effect on the interests of the person who provided it. She went on to consider whether the information is exempt from disclosure under regulation 13.

Regulation 13 – Personal information

18. The Commissioner notes that, following further disclosures to the complainant during the course of her investigation, the Council continued to withhold under regulation 13 the following information that falls within the scope of the complaint:

- (i) the full name and postal address of the applicant where correspondence was from the applicant to the Council;
- (ii) the email address of the applicant's agent; and
- (iii) the full name, job title/team name, email address and phone number for junior Council planning officers (i.e. officers below Head of Service level) contained in correspondence with the applicant and the applicant's agent.

19. In relation to (iii) (above), the Commissioner notes that the withheld information that falls within the scope of the complaint contains the names, job title/team name, email address and telephone number of two planning officers and the name of another officer which is contained in an application form submitted by the applicant.
20. The Commissioner also considered whether the information to which the Council applied regulation 12(5)(f) and which the Commissioner determined was not exempt under that exception, is exempt from disclosure under regulation 13. However, as with her consideration of application of regulation 12(5)(f) to that information, because the Council's view is that the disclosure of some of its arguments would provide details of the information that it is seeking to withhold, she has also considered the application of this exception in the confidential annex attached to this notice. A copy of the confidential annex has been provided to the Council but not to the complainant.
21. Under regulation 13, to the extent that the information requested includes personal data of which the person making the request is not the data subject, a public authority should not disclose the personal data if it

would breach any of the data protection principles under the Data Protection Act ("DPA").

(A) Information also withheld under regulation 12(5)(f)

22. The Commissioner has determined, as set out in the confidential annex, that the information which is not exempt from disclosure under regulation 12(5)(f), is also not exempt from disclosure under regulation 13 as its disclosure would be fair and lawful and at least one of the conditions in Schedule 2 of the DPA is met.

(B) Information only withheld under regulation 13

Does the withheld information constitute personal data?

23. The Commissioner considers that the information withheld by the Council which is specified in (i), (ii) and (iii) (above) constitutes the personal data of the individuals concerned. She therefore went on to consider whether its disclosure would breach any of the data protection principles.

Would disclosure breach one of the data protection principles?

24. The Commissioner considered whether the disclosure of the withheld information would breach the first principle of the DPA. The first data protection principle requires that any disclosure of information is fair and lawful and that at least one of the conditions in Schedule 2 is met.
25. The Commissioner initially considered whether the disclosure of the withheld information would be fair and lawful. To do so she took into account the following factors:
- (i) the individual's reasonable expectations of what would happen to their information;
 - (ii) whether disclosure would cause any unnecessary or unjustified damage or distress to the individuals concerned; and
 - (iii) whether the legitimate interests of the public were sufficient to justify any negative impact to the rights and freedoms of the individuals concerned.

The reasonable expectations of the individuals concerned

26. The Commissioner considered the reasonable expectations of the individuals whose personal data had been withheld, in terms of what would happen to that data. These expectations can be shaped by factors

such as an individual's general expectations of privacy and also the purpose for which they provided their personal data.

27. The Council argued that junior planning officers' reasonable expectations were that their personal data, albeit relating to their work life, would not be disclosed in response to requests for information under information rights legislation. Its policy is that junior officers (that is officers below the grade of Head of Service) did not have their personal information made public in response to requests for information. The Council stated that:

"The junior officers are fulfilling the functions of the council, H&F. It is H&F as an organisation, and in this particular case as a Local Planning Authority, that is the recognised party, the junior officer's actions are on behalf of the organisation not on their own behalf and as they are not senior officers, H&F does not consider it reasonable to make their personal details public. There is a public interest in understanding the decisions that H&F make and understanding which service areas of the council make these decisions but in this instance there is no public interest in understanding which specific junior officers were involved in the decision making process."

28. The complainant objected to the withholding of the Council officers' details. In commenting on the Council's arguments, he noted that the planning officers' details appeared in the reports recommending approval of the proposals and in correspondence with the applicant, which was already available on the Council's website. He informed the Commissioner that, similarly, the details of the Enforcement Officer had been given to him and so it seemed pointless to withhold the email addresses and direct phone numbers. He provided the Commissioner with copies of correspondence received during the planning process which contained contact details for Council officers.
29. When considering what information an individual should expect to have disclosed about them, the Commissioner considers that a distinction should be drawn between information relating to their public life and information relating to their private life. The Commissioner's view is that information which relates to an individual's private life (i.e. their home, family, social life or finances) will normally deserve more protection than information about them acting in an official or work capacity (i.e. their public life).
30. The Commissioner notes that the withheld information relating to the Council officers concerns them acting in a work related capacity, not information concerning their private lives.

31. The Commissioner's guidance concerning section 40 entitled "*Requests for personal data about public authority employees*" states that:

"Information about an employee's actions or decisions in carrying out their job is still personal data about that employee, but given the need for accountability and transparency about public authorities, there must be some expectation of disclosure." (para 16)

32. The guidance goes on to state:

"It may also be fair to release more information about employees who are not senior managers but who represent their authority to the outside world, as a spokesperson or at meetings with other bodies. This implies that the employee has some responsibility for explaining the policies or actions of their authority; it would not apply simply because an employee deals with enquiries from the public or sends out material produced by others." (para 18)

33. The Commissioner notes that in respect of two of the Council's officers, their names, job titles, telephone numbers and email addresses are contained within the withheld information. This information in respect of the same two officers is contained in documents on the Council's website or within correspondence sent out to the public related to the relevant planning matter. The Commissioner accepts that they may not be seen as senior staff within the Council. However, given the nature of their posts, it would appear that they would correspond with members of the public on a regular basis explaining the Council's policies and actions. She therefore believes that there must be a reasonable expectation on their part that their details contained within the withheld information might be disclosed in response to a request under the EIR.
34. The withheld information also contains the name of one other Council officer, in an application form from the applicant, but it does not include their job title, telephone number or email address. The Commissioner has not been able to identify any documents in the public domain connecting this officer with this planning matter. Consequently, she does not believe that there would be a reasonable expectation on their part that their name would be disclosed in response to a request under the EIR.
35. In relation to the withholding of the applicant's name and address where correspondence is from the applicant, the Council explained that:

"The applicant's full name and postal address is made public as part of the public planning register. We therefore consider that

the individual would have a reasonable expectation that their full name and postal address would be made public in relation to the planning applications made on [address] to the same extent that the information is already publicly available on the public planning register. However, we consider that the individual would not expect their name and postal address to be made public where it provides additional information about them to that already published on the planning register. The majority of the correspondence from the applicant has been disclosed, it is only the details which specifically identify them as the sender of the correspondence that have been withheld. If H&F were to disclose the name and address of the applicant on the correspondence from them then we would be making additional information public to that already published and the individual would not expect this.

In planning applications an applicant or an agent may correspond with the local planning authority regarding planning applications. We consider there is a legitimate interest in the public understanding that there has been correspondence between either the Agent or the Applicant and the Local Planning Authority regarding the planning applications, however there is no legitimate interest in understanding whether it was specifically the Agent or the Applicant that sent the correspondence. We therefore consider that disclosure of the withheld information would not be fair and that none of the conditions for processing under Schedule 2 of the DPA are met."

36. In respect of the Council's decision to withhold the name and address of the applicant, where correspondence is from the applicant to the Council, the Commissioner notes that the application form for the request for the variation of the relevant planning permission is available on the Council's website. This contains the applicant's name and postal address. In light of this, the Commissioner believes that there must be a reasonable expectation on the applicant's part that this information might be disclosed in response to a request under the EIR.
37. In respect of the Planning Agent's reasonable expectations, the Council commented that their full name would be publicly available as it was published as part of the public planning register records. However, it did not believe that they would expect their email address to be made public as this was not published on the planning register.
38. The complainant argued that the email address of the Planning Agent should be disclosed as it was available via a search against his name on the internet and so it was in the public domain.

39. The Commissioner has searched on the internet in respect of the Planning Agent's name and has identified an email address which is publicly available to allow people to contact him for work related matters. However, the email address contained within the withheld information is not the same email address. Whilst this email address was used for work related matters, the Commissioner is concerned that this could be an email account that is not used solely for business purposes. As it is not an email address that the Planning Agent appears to have made public, the Commissioner considers that he may have some expectation of privacy in respect of that address.

The consequences of disclosure

40. In respect of the two officers whose names and details are contained in documents related to this planning matter on the Council's website or within correspondence sent out to the public, the Commissioner is not persuaded that the disclosure of this information would cause damage or distress to the officers concerned. However, she does accept that disclosure potentially might cause some damage or distress in respect of the officer whose only personal data in the withheld information is their name, given that there does not appear to be anything in the public domain connecting them with this matter.
41. In relation to the applicant's name and address contained in correspondence from him or his Planning Agent, given that his name and address is contained in a significant number of documents on the Council's website in relation to the planning application, again the Commissioner is not persuaded that its disclosure would cause him damage or distress.
42. However, in relation to the Planning Agent's email address, as this does not appear to be publicly available, the Commissioner does accept that the disclosure of this information could cause damage or distress.

Balancing the rights and freedoms of the data subjects with legitimate interests of the public

43. The Commissioner notes that, notwithstanding a data subject's reasonable expectations or any damage or distress caused to them by disclosure, depending on the circumstances of the case, it may still be fair to disclose personal data if there is a more compelling public interest in disclosure. In considering 'legitimate interests', the Commissioner's view is that such interests can include broad general principles of accountability and transparency for their own sakes, as well as case specific interests.

44. As regards the planning officers' personal information, the Council argued there was no legitimate interest in the specific officer's details being disclosed to the world at large when they were junior officers. It believed that there was a public interest in understanding what processes were followed and decisions made by the Council but there was no public interest in understanding which specific junior officers were involved with those processes in these particular planning applications. It therefore considered that in addition to disclosure not being fair, it also would not meet one of the conditions for processing under schedule 2 of the DPA.
45. In relation to the two planning officers whose names, job titles and contact details are contained in the withheld information, the Commissioner believes that disclosure of these details would be fair and lawful, given that this information is already in the public domain in connection with this planning matter. It serves a legitimate public interest in confirming to the public which officers were involved, on behalf of the Council, in dealing with this matter and allows the public to contact them about it.
46. However, the Commissioner considers that there is no overriding public interest in the disclosure of the name of the third Council officer, who is not identified as connected with this matter in publicly available information. Consequently, she does not believe that the disclosure of this information would be fair and lawful.
47. In relation to the applicant's name and address contained in correspondence from him, the Commissioner considers that the disclosure of this information serves a legitimate interest in confirming the name and address of the applicant in relevant correspondence with the Council. Consequently, she believes that the disclosure of this information would be fair and lawful.
48. As regards the email address of the applicant's agent, the Commissioner considers that it would not be fair and lawful to disclose this information as it does not appear to be publicly available.

Is one of the conditions in Schedule 2 of the DPA met?

49. Having determined that it would be fair and lawful to disclose the names and contact details of the two planning officers and the name and address of the applicant which are contained in the withheld information, the Commissioner then considered whether one of the conditions in Schedule 2 of the DPA is satisfied. In relation to these conditions, she believes that the most appropriate condition for consideration is the sixth condition which states that:

"The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms of legitimate interests of the data subject".

50. The Commissioner has identified in the section above, why she believes that the disclosure of the withheld information, with the exception of the name of one Council officer and the email address of the Planning Agent, would serve a legitimate public interest. As a result she is satisfied that a condition in Schedule 2 is met and that regulation 13 is not applicable to the names and contact details of the two planning officers and the name and address of the applicant.

Procedural issues

Regulation 7(1) – Extension of time to respond to request

51. When it initially responded to the complainant's request, the Council explained that it required an extension to the 20 working day limit under regulation 7(1) of the EIR due to the request being assessed as complex and voluminous.
52. Regulation 7(1) allows a public authority to extend the time for its response to a request to 40 working days where *"...it reasonably believes that the complexity and volume of the information requested means that it is impracticable either to comply with the request"* within 20 working days or make a decision to refuse to do so.
53. The complainant argued that his request was for information relating to a minor planning application relating to one property and therefore did not believe that it was reasonable for the Council to extend the time for its response beyond 20 working days.
54. The Council noted the complainant's comments. However, although it agreed that the request related to one planning matter, it considered that the quantity of information that needed to be gathered and reviewed to determine whether it was relevant to the request and whether it would be reasonable to refuse the request was voluminous. It pointed out that, as an example, when the matter was considered at internal review stage, the officer leading the review took at least 4 working days on the case reviewing the approximately 100 A4 pages of information that was considered relevant to the request, discussing the information with officers in the Planning Service and identifying the information that should be refused.

55. The Council went on to explain that, at the original request stage, a similar amount of time was spent by the officers from its InTouch team and Planning Service to complete the same activities as at the internal review stage. Additional time was spent locating the relevant information through checks of the electronic planning system and paper files in order to respond to the request. It noted that this additional time was unnecessary at internal review stage as the information had already been gathered as part of responding to the original request.
56. The Commissioner was informed by the Council that both its InTouch team and the Planning Service needed to be involved in responding to this request. The Planning Service held the requested information and had the skills and expertise to locate it most quickly and to determine the information relevant to the request. They also needed to identify where there would be any concerns about disclosing the information.
57. The Council stated that its InTouch team had the skills and experience in the information rights legislation that the request was being processed under. It recognised that the 'active' time spent on the case did not equal the time elapsed between the request received date and the request response date. However, the 'active' time spent on the case needed to be spent in between the involved service areas spending time on other work.
58. The Council explained that the officers in the Planning Service worked on the request at the same time as working on other requests for information under the EIR and FOIA and in addition on subject access requests under the DPA from other requesters, and also from this requester. It said that they did this at the same time as undertaking the service area's primary statutory functions of processing planning applications and planning enforcement cases, responding to planning enquiries, and preparing for appeal cases lodged with the Planning Inspector. The Council considered that it would be unreasonable for the Planning Service to give this EIR request higher priority than the other work being handled by the service area.
59. The Council went on to explain that, similarly, its InTouch team processed many requests for information under the EIR and FOIA, subject access requests under DPA, corporate and ombudsman complaints and Councillor and Members enquiries as part of the service they delivered. Again, it considered it unreasonable that this particular request should be given a higher priority than other InTouch led casework. Therefore, it did not believe that it was practical to provide the information or make a decision about whether to refuse the request within 20 working days.

60. The Council stated that whilst it recognised the requester's frustration that it found it necessary to extend the time for the response to the request to 40 working days, it felt in this instance that it was justifiable due to the volume of information to be located and considered, alongside the involved service area's need to progress other equally prioritised work.
61. The complainant, commenting on the points made by the Council, informed the Commissioner that he had been sent 146 pages of scanned documents, which were provided to her. Of the 146 pages, he noted that 72 were blank, leaving 74 pages with something written on them. Of these 74 pages, he contended that many were copies of emails forwarded to others so much of the information contained in them was duplicated.
62. The complainant noted the Council's claim that 4 days was spent reviewing what was sent to him. He calculated that this amounted to 1920 minutes of officer time or 26 minutes per page, which he was sceptical about.
63. The complainant also noted that the Council had stated that it had to review paper files. He informed the Commissioner that he had asked to see the files in September 2015 and was shown a folder with a few sheets of paper in it. He had then asked the whereabouts of the remaining information and was told by a Council officer that it was all held electronically. He was further told that if he wanted to see it, he would have to make an FOI request for it. He therefore did not believe the Council's claim as to the extent of work involved as he believed that it could have easily been interrogated.
64. As far as discussions with planning officers were concerned, the complainant argued that they were not qualified to give opinions on what should be disclosed or not (under the EIR) and therefore did not believe that any time spent on this aspect should be taken into account.
65. In relation to this latter point, the Council informed the Commissioner that it considered that those officers that held the requested information should be consulted as to their opinions on whether the requested information should be disclosed or withheld. This was because they would be familiar with the likely impact on the Council and third parties (e.g. individuals, suppliers, developers) of disclosing information to the world in response to a request for information.
66. The Council went on to explain that where the officers in the services areas that hold the requested information (e.g. Planning Officers) raise concerns about disclosing some or all of the information, they then engage with the Council's InTouch team who assist with determining

whether the concerns that have been raised correspond to any exceptions under the EIR (where this is the legislation that the request is being processed under), whether the criteria that must be met for the exception to be engaged are met in this instance and whether the outcome of the public interest test supports disclosing or withholding the information.

67. The Council stated that it followed the above approach when processing the complainant's request for information and therefore time was spent by officers in both Planning and its InTouch team considering what impact disclosing the information might have, whether any exceptions under EIR would apply and the public interest test.
68. The Commissioner notes that her guidance about the time limits for compliance under the EIR states in relation to regulation 14(1), at paragraph 52, that:

"A public authority may only apply the extension where it reasonably believes it will require additional time to locate and provide the information because;

- *the requester has asked for a large amount of complex information; **AND***
 - *it would not be practical to provide the information or make a decision about whether to refuse the request within 20 working days."*
69. In relation to the arguments presented by the Council, the Commissioner accepts that it will often be necessary for officers that are charged with responding to a request for information to consult with colleagues who work in the area to which the request relates in order to ensure that, before a response is provided, they are aware of all of the relevant issues concerning the requested information. She also accepts that officers that are responding to requests may have other duties to undertake and cannot be expected to concentrate solely on responding to a specific information request to the exclusion of those other duties.
70. In relation to this case, many of the documents provided to the complainant contain some redactions on the basis that the exception in regulation 13 applies to that information. The Commissioner acknowledges that it may well have taken some time to identify and redact this information. However, she does note that most of these redactions relate to the names and contact details of Council officers rather than a range of different types of information.

71. The Commissioner also notes that the requested information concerns issues that arose in relation to planning permission for a small extension to a domestic property. This would consequently be a relatively minor matter compared with other much larger planning applications, and issues arising from such planning applications, that the Council would sometimes have to consider. In addition, having reviewed the information falling within the scope of the request, it appears to consist of the types of documents that would be expected to be sent and received by a local authority in such circumstances. It also consists of quite a lot of relatively short emails. In the Commissioner's view, the information therefore does not appear to consist of documents which are particularly unusual in such circumstances or are intrinsically complex in themselves.
72. Whilst the Commissioner accepts that the Council may have spent a considerable time determining whether parts of the requested information was subject to exceptions under the EIR, she reminds herself that regulation 7(1) requires consideration of "*the complexity and volume of the information requested*". She is not persuaded that it was reasonable for the Council to conclude that the information falling within the scope of the complainant's request was both complex and voluminous so as to make it impracticable to comply with the request within 20 working days. Consequently, she has determined that it breached regulation 7(1) of the EIR.

Regulation 11(4) - Time for completion of internal review

73. Regulation 11(4) requires a public authority to notify a requester of the outcome of an internal review no later than 40 working days after the date of receipt of the requester's representations. The complainant requested an internal review on 1 March 2016 and received the outcome of the internal review on 10 June 2016. The Council therefore breached regulation 11(4) as it took more than 40 working days to provide the complainant with its internal review response.

Other matters

74. The Commissioner has referred on a number of occasions in this notice to withheld information being made publicly available by the Council. She expects that in future, before withholding information, the Council will check more carefully whether it has itself already placed any of that information in the public domain.
-

Right of appeal

75. 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

76. 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.
77. 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

Rachael Cragg
Group Manager
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF