

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 3 October 2017

Public Authority: Foreign and Commonwealth Office
Address: King Charles Street
London
SW1A 2AH

Decision (including any steps ordered)

1. The complainant submitted a request to the Foreign and Commonwealth Office (FCO) seeking information about the export of a particular ship to Nigeria. The FCO disclosed some information to the complainant but sought to withhold the remainder on the basis of sections 27(1)(a) and (c) (international relations), 31(1)(a) and (b) (investigations), 35(1)(a) (formulation and development of government policy) and section 40(2) (personal data). The Commissioner has concluded that sections 27(1)(a) and (c) are engaged and that the public interest favours maintaining the exemption. However, she has also concluded that the exemptions contained at sections 31(1)(a) and (b) and 35(1)(a) are not engaged and furthermore that 40(2) section only partially applies.
2. The Commissioner requires the public authority to take the following steps to ensure compliance with the legislation.
 - Provide the complainant with a further copy of the information falling within the scope of her request with the information previously withheld on the basis of sections 31 and 35 unredacted and the domain names of all email addresses unredacted.
3. 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

4. The complainant submitted the following request to the FCO on 24 March 2016:

'This is a request for information made under the Freedom of Information Act to The FCO concerning information relating to the export of ships to Nigeria.

If you need to narrow your searches to certain departments, please narrow them to:

- *West Africa Directorate (inlc: British Embassy in Nigeria)*
- *Office of the Secretary of State*

For the period March 2014 and October 2014

- 1. Any documentation including communications concerning*

- a. MV Horten or its export license ML9a1*
- b. CAS Global*
- c. Global West Vessel Services,*

In your search for documents please ensure that you search for communications between the FCO and

- i. UKTI*
- ii. Cabinet Office*
- iii. Department of Business and Skills*

If exceptions apply please provide a schedule of the information held with generic description of the information withheld [sic].

Where information is exempted from disclosure please provide redacted information in original format, rather than digested extracts.'

5. The FCO contacted the complainant on 25 April 2016 and confirmed that it held information but explained that it considered this to be exempt from disclosure on the basis of sections 40 (personal data) and 27 (international relations) of FOIA and that it needed additional time to consider the balance of the public interest test.
6. The FCO sent the complainant further public interest test extension letters on 24 May and 22 June 2016 and in these letters explained that it was also considering the balance of the public interest in respect of sections 30 (investigations), 35 (government policy) and 36 (effective conduct of public affairs) of FOIA.

7. The FCO provided the complainant with a substantive response to her request on 20 July 2016. The FCO provided her with some of the information falling within the scope of her request. It explained that the remaining information had been withheld on the basis of the exemptions contained at sections 27, 30, 40 and 35 of FOIA.
8. The complainant contacted the FCO on 10 August 2016 and asked it to conduct an internal review of its handling of this request.
9. The FCO informed her of the outcome of the internal review on 22 November 2016. The review upheld the application of the exemptions contained at sections 27(1)(a) and 35(1)(a) of FOIA and explained that it was seeking to rely on section 31(1)(a) rather than an exemption contained within section 30. The FCO also explained that it was satisfied that sufficient searches had been carried out to locate all information falling within the scope of the request.

Scope of the case

10. The complainant contacted the Commissioner on 16 December 2016 to complain about the way her request for information had been handled.
11. She asked the Commissioner to consider the FCO's decision to withhold information falling within the scope of her request on the basis of the exemptions at sections 27, 31 and 35. In relation to the FCO's reliance on section 40(2), she asked the Commissioner to consider the FCO's decision to withhold the entirety of the email addresses of staff. The complainant also noted that a number of emails disclosed to her referred to attachments but such attachments had not been provided to her, even in redacted form. She also questioned whether the FCO had located all of the information it held falling within the scope of her request.

Reasons for decision

Section 27 – international relations

12. The FCO sought to withhold some of the requested information on the basis of sections 27(1)(a) and (c) of FOIA. These sections state that:

'Information is exempt information if its disclosure would, or would be likely to, prejudice –

(a) relations between the United Kingdom and any other State...

(c) the interests of the United Kingdom abroad'

13. In order for a prejudice based exemption, such section 27(1), to be engaged the Commissioner considers that three criteria must be met:

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

14. Furthermore, the Commissioner has been guided by the comments of the Information Tribunal which suggested that, in the context of section 27(1), prejudice can be real and of substance '*if it makes relations more difficult or calls for a particular damage limitation response to contain or limit damage which would not have otherwise have been necessary*'.¹

The FCO's position

15. In its submissions to the complainant the FCO argued that disclosure of information detailing its relationship with the Norwegian, Togolese and Nigerian governments could potentially damage the UK's bilateral relationships with these states and hamper the UK government's ability to act in pursuit of key foreign policy priorities including in counter-terrorism and EU affairs. In its more detailed submissions to the Commissioner the FCO suggested that its concerns related only to the

¹ [Campaign Against the Arms Trade v The Information Commissioner and Ministry of Defence \(EA/2006/0040\)](#), paragraph 81.

harm that would be likely to occur to the UK's relations with Nigeria and Norway. The FCO's submissions to the Commissioner highlighted a number of examples of the information redacted on the basis of sections 27(1)(a) and (c) to support its reliance on these exemptions. Clearly the Commissioner cannot replicate these examples in this notice as to do so would reveal the content of the withheld information itself. However, the thrust of the FCO's argument was that the issue in question was a sensitive subject, which required the use of appropriate channels and diplomacy, and that disclosure of information that was intended for internal discussions only would be likely, against this context, to harm both the UK's relations with Nigeria and Norway.

The Commissioner's position

16. With regard to the first criterion of the three limb test described above, the Commissioner accepts that the potential prejudice described by the FCO clearly relates to the interests which the exemptions contained at sections 27(1)(a) and (c) are designed to protect. With regard to the second criterion the Commissioner is satisfied that disclosure of the information also has the potential to result in prejudice to the UK's relationships with the other countries identified by the FCO. She has reached this conclusion given the sensitivity of the subject matter in question. Thirdly, the Commissioner is persuaded that if the redacted information was disclosed there is more than a hypothetical risk of prejudice occurring; rather there is a real and significant risk. The Commissioner has reached this conclusion, again given the sensitive nature of the subject matter but also because of the candour of the comments that have been redacted on the basis of section 27(1)(a) and (c). The examples provided by the FCO to the Commissioner also provide compelling evidence of why such prejudice would be likely to occur. In this context the Commissioner considers it likely that disclosure of the information redacted on the basis of these exemptions would be likely to result in some element of a damage limitation exercise on the part of the UK government.

17. Sections 27(1)(a) and (c) are therefore engaged.

Public interest test

18. Section 27 is a qualified exemption and therefore the Commissioner must consider the public interest test and 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 in maintaining the exemption

19. The FCO emphasised that section 27 recognises that the effective conduct of international relations depends upon maintaining trust and confidence between governments. It argued that if the UK does not

maintain this trust and confidence, its ability to protect and promote UK interests through international relations will be hampered, which will not be in the public interest.

Public interest in disclosing the withheld information

20. The complainant provided the Commissioner with detailed submissions to support her view that the withheld information should be disclosed and the Commissioner has summarised these below.
21. The complainant explained that her understanding of the circumstances surrounding this request was as follows: In 2014 a UK company, CAS Global, exported a former Norwegian naval vessel, MV Horten, to a Nigerian marine security company controlled by what she described as a Nigerian warlord. She explained that Global West Vessel Specialist (GWVS) is controlled by Government Ekpemupolo aka 'Tompson', former leader of the Movement for the Emancipation of the Niger Delta (MEND). The complainant explained that MEND is a militant organisation that terrorized the Niger Delta for nearly a decade until its ceasefire in 2014. The complainant noted that Tompolo himself disarmed in 2009, and two years later the company he controlled, GWVS, was awarded a \$103m dollar contract to assist the Nigerian coastguard in combatting oil piracy.
22. The complainant explained that it was her understanding that MV Horten came to port in Ramsgate in March 2014, and CAS Global applied for a license to export her to Nigeria but after failing to get the correct manning and certification in place to keep her British flag, the company registered MV Horten under the Togolese flag.
23. In a series of articles in the summer of 2014, the complainant highlighted that the Norwegian paper *Dagbladet* revealed the planned export of the MV Horten to GWVS via CAS Global. CAS Global had already facilitated the sale of six fast attack craft – also former Norwegian naval vessels – to GWVS. Nonetheless the UK approved the sale, and in December MV Horten arrived in Lagos.
24. The complainant explained that in December 2014, shortly after MV Horten finally arrived in Nigeria, Tompolo joined with other 'former' militants in threatening to resume military activities if their favoured candidate, incumbent President Goodluck Jonathan, did not win the elections scheduled for February. The complainant noted that Tompolo, who is now on the run, has now been charged by the Economic and Financial Crimes Commission (EFCC) of defrauding £79m from the Nigerian state.
25. The complainant emphasised that in Norway the scandal led to two parliamentary inquiries, and the Prime Minister has publicly apologized for allowing the sale to CAS Global to take place. Nonetheless the complainant has suggested that the Norwegian authorities insist that

they only warranted the sale of the ship to the UK on condition that it would be British flagged, manned by British personnel.

26. The complainant argued that in the UK there has been no transparency over how or why the export license was granted. The incident was not mentioned in the Export Controls annual report, and was not considered by the Parliamentary Committee on Strategic Export Controls. The complainant suggested that the information disclosed in response to this request shows that the FCO approved the export despite knowing of Tompolo's involvement with GWVS and when the *Dagbladet* articles had already been published. The complainant suggested that the articles contained information on the fact that Norway had approved the sale only based on the criteria above. However the complainant argued that due to information being withheld by the FCO, there is no clarity over how and why the license was approved. The complainant argued that the decision deserves proper scrutiny in order to ensure that similar incidents do not recur.

Balance of the public interest test

27. The Commissioner recognises that the export of the ship that is the focus of the complainant's request has been a matter of public interest. She agrees with the complainant that there is clear and weighty public interest in the disclosure of information that would increase the transparency of the actions and roles of UK government departments in this issue. This is particularly the case given the relatively transparent way this issue would appear to have been addressed in Norway. Furthermore, the Commissioner accepts that the disclosure of the information that has been withheld on the basis of sections 27(1)(a) and (c) would go a notable way to clarifying how and why the license was approved. In the Commissioner's view the public interest in the disclosure of this information should not be underestimated. However, the Commissioner agrees with the FCO that there is a very strong public interest in ensuring that the UK enjoys effective relations with other states and as a result the public interest in maintaining the exemption attracts very significant weight. On balance, and by a narrow margin, the Commissioner has concluded that this outweighs the public interest in the disclosure of the withheld information.

Section 35 – formulation and development of government policy

28. The FCO withheld some of the requested information on the basis of section 35(1)(a) of FOIA. This exemption states that:

'Information held by a government department or by the National Assembly for Wales is exempt information if it relates to-

(a) *the formulation or development of government policy'*

29. Section 35 is a class based exemption, therefore if information falls within the description of a particular sub-section of 35(1) then this information will be exempt; there is no need for the public authority to demonstrate prejudice to these purposes.
30. The Commissioner takes the view that the 'formulation' of policy comprises the early stages of the policy process – where options are generated and sorted, risks are identified, consultation occurs, and recommendations/submissions are put to a Minister or decision makers. 'Development' may go beyond this stage to the processes involved in improving or altering existing policy such as piloting, monitoring, reviewing, analysing or recording the effects of existing policy.
31. However, the exemption will not cover information relating purely to the application or implementation of established policy. It will therefore be important to identify where policy formulation or development ends and implementation begins.
32. This is not to say that policy design and implementation are always entirely separate. The Commissioner recognises that they are becoming increasingly integrated, and that many implementation issues will also relate to policy formulation. Considering the risks and realities of implementation may be an important factor when assessing policy options. If implementation issues are actively considered as part of the policy design (ie before a policy decision is finalised) and feed into that process, they will also relate to the formulation of the policy.
33. Even after a policy decision has been made, issues arising during implementation may then feedback into a policy improvement process, and some details may be adapted on an ad hoc basis during implementation. However, fine-tuning the details of a policy does not automatically amount to policy development, and sometimes may more accurately be seen as adjustments to its implementation. Whether a particular change amounts to policy development will depend on the facts of that case.
34. In particular, the Commissioner does not accept that there is inevitably a continuous process or 'seamless web' of policy review and development. In most cases, the formulation or development of policy is likely to happen as a series of discrete stages, each with a beginning and end, with periods of implementation in between.
35. Ultimately whether information relates to the formulation or development of government policy is a judgement that needs to be made on a case by case basis, focussing on the precise context and timing of the information in question.

36. The Commissioner considers that the following factors will be key indicators of the formulation or development of government policy:
- the final decision will be made either by the Cabinet or the relevant Minister;
 - the government intends to achieve a particular outcome or change in the real world; and
 - the consequences of the decision will be wide-ranging.
37. The complainant questioned whether the withheld information fell within the scope of this exemption. Firstly, this was on the basis that the information which had been disclosed to her did not indicate that any ministers were involved with the decision to export the MV Horten to GWVS. The complainant suggested that if any of these decisions were signed off by the relevant minister then she would have expected this to have been disclosed with the name of the minister unredacted since ministers' names clearly meet the threshold for section 40.
38. Secondly, the complainant noted that if the FCO sought to argue that this is a case of implementation of policy which feeds into a continual policy making process – the Commissioner's guidance on this exemption noted that *'fine-tuning the details of a policy does not automatically amount to policy development.'* In the circumstances of this case the complainant argued that if this information, ie a risk assessment of a particular export, was accepted as falling within the scope of this exemption then that would mean that almost all the operational activities of the FCO came under the ambit of policy formulation.
39. The Commissioner asked the FCO to clarify which specific government policy it considers the information to relate to.
40. In response the FCO explained that the FCO is one of three government departments which contribute to a joint unit called the Export Joint Control Unit.
41. The FCO explained that it rigorously examined every export licence application on a case-by-case basis against the Consolidated EU and National Arms Export Licensing Criteria (the "Consolidated Criteria"). The Consolidated Criteria provide a thorough risk assessment framework. They require the FCO to think hard about the impact of providing equipment and its capabilities to overseas end-users. In doing so, the FCO explained that it drew on all available information, including reports from non-government organisations and the UK's overseas network. Any application it receives may be subject to Ministerial scrutiny and approval, and so the discussions had at official level in

consideration of licences (at any stage) have the potential to form the basis of Ministerial submissions and decision-making. The FCO explained that crucially, each application has the potential to crystallise, develop or otherwise change policy-making. This is because, in assessing each application on a case by case basis against the same legal and regulatory framework, each application effectively is added to the bank of policy-making in relation to the relevant aspects of the Consolidate Criteria, the items in question, or the country to which the items might be exported.

42. As a result the FCO explained that arms exports licensing policy (whether or not to recommend that the licence is granted) constantly evolves and is considered afresh with each application, and each application (and the discussions around them) have the potential to impact very many policy decisions for future licence applications.
43. Furthermore, the FCO advised it also checks whether a licence has been refused for the same goods to the same end-user by another EU Member State. This check is carried out under the EU Member States' system of denial notification. Therefore any decision that the FCO makes has wide ranging implications not only to the UK but to the wider international community.
44. The FCO noted that its posts overseas have a standing requirement to monitor conditions in their respective countries or regions and to report back if there are any developments that might affect licensing policy. This includes monitoring human rights, regional tensions and the risk of exports being diverted to an unintended end-use. In addition, the government draws on all available information, including checks using both open and classified sources, reports from non-government organisations and the UK's (or the FCO's) overseas network, involving Desk and Post in the Foreign Office, when considering licence applications.
45. As the Commissioner's comments above indicate, she accepts that there can be some crossover between policy making and the implementation of existing policy. However, in the Commissioner's opinion the FCO's description of how arms exports licensing policy is constantly evolving with each application informing decisions about future licence applications is in essence a description of a seamless web of policy making. As noted above, the Commissioner, supported by the Tribunal, does not consider such a position to be sustainable. Consequently, in the Commissioner's opinion although this is a finely balanced decision, she is of the view that the information concerning arms exports relates more to the implementation of government policy. That is to say the decision whether or not to grant a licence, based upon the Consolidated Criteria concerns an operational decision rather than one that could be

accurately categorised as one relating to the formulation or development of government policy.

46. Therefore, in the Commissioner's opinion section 35(1)(a) is not engaged to the information specified by the FCO.

Section 31 – investigations

47. In its internal review the FCO explained that it was seeking to withhold some of the withheld information on the basis of section 31(1)(a) of FOIA. During the course of the Commissioner's investigation the FCO explained that it was also now seeking to apply the exemption contained at section 31(1)(b) to the same information.

48. These sections of FOIA states that:

'Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice –

- (a) the prevention or detection of crime,*
- (b) the apprehension or prosecution of offenders'*

49. As section 31 is a prejudice based exemption, as with the exemptions contained at section 27(1), in order to be engaged the three criteria contained at paragraph 13 above have to be met.

50. The Commissioner initially received submissions from the FCO in order to support its reliance on this exemption on 9 March 2017 (indeed this letter also contained the FCO's submissions to support its reliance on the other exemptions it cited). Having reviewed the FCO's submissions in respect of section 31, which she considered to be somewhat generic, the Commissioner contacted the FCO again to ask for more detailed submissions which explained why disclosure of the information withheld on the basis of section 31 would be likely to be prejudicial. The FCO responded on 7 April 2017 and provided brief further submissions, but noted that it needed additional time to provide a more detailed response in consultation with the relevant third parties. The FCO provided the Commissioner with further submissions on 3 May 2017 to support its reliance on this exemption. These submissions were subsequently provided to the complainant, by the FCO, when it contacted her on 3 July 2017 and disclosed further information to her. The Commissioner has quoted these submissions below:

'We [third party] [ie the FCO] have been in discussions with the relevant public bodies who have the main equity in this information, and on whose behalf we have applied this exemption. They have reiterated the significance of the fact that, since the original response to the requestor [yourself] was made, further investigation interest, in

other words another investigatory body, has engaged and that the exemption contained in section 31(1)(b) - the apprehension or prosecution of offenders – also applies. We [third party] have now been informed that the release of the information currently withheld would, or would be likely to prejudice the prosecution of an offender, or offenders by inferring and/or thereby revealing that criminal activity is likely to have been carried out. Furthermore, the release of the information currently withheld could adversely impact on any investigative action and the ultimate outcome of that investigative action. We [third party] are informed that this prejudice is, on the balance of probabilities, more likely than not to adversely impact on any enforcement process and its ultimate outcome.'

51. In relation to whether the three criteria set out above are met, the Commissioner accepts that the first criterion is met as the potential prejudice described by the FCO relates to the interests which the exemptions contained at sections 31(1)(a) and (b) are designed to protect. In relation to the second criterion, based upon the FCO's submissions the Commissioner is also persuaded that this is met. Although the FCO's submissions are somewhat oblique it would appear that some form of criminal investigation is being undertaken in the UK in respect of this matter. (This appears to be confirmed by the following newspaper articles, one dating from before the request and one post-dating the request²). The Commissioner accepts that there is arguably some causal link between disclosure of withheld information which discusses aspects of the ships export and harm potentially occurring to the interests which the exemptions are designed to protect. However, the Commissioner is not satisfied, based upon the submissions she has received from the FCO, that the third criterion is met. In reaching this conclusion she would emphasise that she has provided the FCO with a number of opportunities to provide her with convincing submissions to support the application of these exemptions. However, despite these opportunities the Commissioner is of the view that the submissions she has received remain somewhat speculative and generic. More specifically, the Commissioner believes that the submissions fail to clearly explain **why** disclosure of the specific information that has been withheld would, or would be likely, to result in the prejudice envisaged. In other words the submissions fail to identify why the risk of harm occurring is anything more than hypothetical. For the avoidance of doubt, the Commissioner does not consider it sufficient for a public

² <http://www.independent.co.uk/news/uk/crime/two-british-businessmen-arrested-on-suspicion-of-involvement-in-sale-of-naval-vessels-to-nigerian-9991217.html> and <https://www.theguardian.com/business/2017/may/14/anti-corruption-police-investigate-uk-firm-cas-global-ex-nigerian-warlord-deal>

authority to argue that these exemptions are engaged simply on the basis that there is an ongoing investigation and an unsubstantiated assertion that disclosure would harm that investigation.

52. The Commissioner has therefore concluded that the exemptions contained at sections 31(1)(a) and (b) are not engaged. In reaching this decision the Commissioner acknowledges that the FCO has been dependent on other public bodies to provide it with sufficiently convincing arguments in respect of this exemption. Nevertheless, she believes that she has provided the FCO with ample opportunity to liaise with bodies to ensure that it can justify its reliance on these exemptions. For the reasons explained above, the Commissioner is of the view that these submissions do not in fact justify such reliance. Consequently, the FCO has concluded that the exemptions contained at sections 31(1)(a) and (b) are not engaged.

Section 40(2) – personal data

53. Section 40(2) of FOIA states that personal data is exempt from disclosure if its disclosure would breach any of the data protection principles contained within the Data Protection Act 1998 (DPA).
54. Personal data is defined in section (1)(a) of the DPA as:
- ‘.....data which relate to a living individual who can be identified from those data or from those data and other information which is in the possession of, or likely to come into the possession of, the data controller; and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any person in respect of the individual.’*
55. The FCO withheld the names of junior FCO staff and their contact details, including their email addresses, on the basis of section 40(2).
56. In relation to the FCO’s application of this exemption, the complainant requested that the domain name of the email showing the department of the sender and recipient(s) of the emails could be left unredacted.
57. The Commissioner accepts that the names of the staff, their contact details and the initial part of the email address constitutes personal data within the meaning of section 1 of the DPA as they clearly relate to identifiable individuals. In respect of the initial part of the email address the Commissioner means the part that would read ‘joe.bloggs’.
58. However, the Commissioner accepts that technically speaking the domain name of the email addresses could be disclosed without any individuals being identified. For example the part of the email address that reads ‘@fco.gov.uk’. This latter part of the email address, the domain name as the complainant refers to it, is not technically personal

data and thus cannot be exempt from disclosure on the basis of section 40(2) of FOIA.

Further information falling within the scope of the request

59. During the course of the Commissioner's investigation eight documents were identified as falling within the scope of the request as they were attached to emails previously disclosed to the complainant. The FCO has now disclosed some of these attachments to the complainant, albeit in redacted form citing the exemptions above, and has sought to withhold some of the attachments in their entirety, again relying on the aforementioned exemptions.
60. In her request for an internal review the complainant noted that the FCO's position would presumably be that information held on the SPIRE system, the government's online export licensing system, would not be held by it for the purposes of FOIA. However the complainant argued that where an FCO employee had added or downloaded documents to SPIRE then clearly that information would be held by the FCO for the purposes of FOIA. In its internal review response the FCO confirmed that the SPIRE system is the responsibility of the Department for International Trade (DIT) and if the complainant wished to obtain information from this system she should direct her request to DIT.
61. The Commissioner agrees with the FCO's suggestion that requests for information contained on SPIRE should be directed to DIT. In respect of the documents that FCO employees may have added or downloaded to this system, given the further searches that the FCO has undertaken in order to locate any attachments to emails the Commissioner is satisfied that if any such information was held by the FCO it would, on the balance of probabilities, have been located during the course of the Commissioner's investigation of this complaint.

Right of appeal

62. 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

63. 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.
64. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed

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