

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

Decision Notice

Date: 16 August 2018

Public Authority: London Borough of Camden
Address: Town Hall
Judd Street
London
WC1H 9JE

Decision (including any steps ordered)

1. The complainant made a series of requests to the London Borough of Camden. The Council refused the requests under section 14(1) of the FOIA and regulation 12(4)(b) of the EIR. The Commissioner's decision is that the Council was entitled to refuse the requests. No remedial steps are required.

Request and response

2. The complainant submitted a number of requests to the Council as follows:
 - a) Request 1: submitted on 7 June 2017, comprising 6 questions
 - b) Request 2: submitted on 7 June 2017, comprising 12 questions
 - c) Request 3: submitted on 8 June 2017
 - d) Request 4: submitted on 16 July 2017, comprising 5 questions
 - e) Request 5: submitted on 16 July 2017, comprising 33 questions
 - f) Request 6: submitted on 19 July 2017, comprising 13 questions
3. The text of each request is set out in full at Annex 1 to this decision notice.

4. The Council responded as follows:
 - Request 1: response issued on 5 July 2017, providing information
 - Request 2: response issued on 5 July 2017, providing information
 - Request 3: response issued on 6 July 2017, providing information
 - Request 4: response issued on 11 August 2017, citing section 14(1) and regulation 12(4)(b)
 - Request 5: response issued on 11 August 2017, citing section 14(1) and regulation 12(4)(b)
 - Request 6: response issued on 11 August 2017, citing section 14(1) and regulation 12(4)(b)
5. On 17 August 2017 the complainant sent the Council what appeared to be a request for internal review. However, when the Council acknowledged receipt the complainant responded to say that it was not a request for internal review.
6. The complainant then sent a further email on 17 August 2017 which he said was a request for internal review. On 10 October 2017 the complainant sent the Council a further request for internal review.
7. On 11 December 2017 the Council advised the complainant that it had completed its internal review. The Council maintained its position that the requests were vexatious under section 14(1) of the FOIA and manifestly unreasonable under regulation 12(4)(b) of the EIR. At this point the Council advised that it would not respond to further requests on the same theme, citing section 17(6) of the FOIA.

Scope of the case

8. The complainant contacted the Commissioner on 22 October 2017. However he did not provide the Commissioner with sufficient evidence to accept the complaint as valid until 16 February 2018. The complainant maintained (amongst other things) that his requests were neither vexatious nor manifestly unreasonable.

Reasons for decision

Section 14(1): vexatious request (FOIA) and regulation 12(4)(b): manifestly unreasonable request (EIR)

9. Section 14(1) of the FOIA states that a public authority is not obliged to comply with a request if the request is vexatious. Similarly, regulation 12(4)(b) of the EIR provides that a public authority may refuse to comply with a request for environmental information to the extent that it is manifestly unreasonable.
10. The Council considered the complainant's requests to include both environmental and non-environmental information. To the extent that the requested information is environmental information within the meaning of regulation 2(1) of the EIR, the Commissioner has considered the Council's reliance on the exception at regulation 12(4)(b) of the EIR. The Commissioner has considered the Council's reliance on section 14(1) in respect of the remainder of the requests.
11. The term vexatious is not itself defined in the FOIA, but in *Information Commissioner v Devon County Council & Dransfield*¹ the Upper Tribunal concluded that 'vexatious' could be defined as the
"...manifestly unjustified, inappropriate or improper use of a formal procedure."
12. The Upper Tribunal decision clearly establishes that the concepts of proportionality and justification are central to any consideration of whether a request is vexatious. The Commissioner's published guidance² also sets out a number of indicators that public authorities may find it useful to consider when determining whether a request is vexatious. The guidance emphasises that all the circumstances of the case must be taken into consideration in order to determine whether a request is vexatious.

¹ UKUT 440 (AAC), 28 January 2013

² <https://ico.org.uk/media/for-organisations/documents/1198/dealing-with-vexatious-requests.pdf>

13. The term “manifestly unreasonable” is similarly not defined in the EIR. The Commissioner’s published guidance³ on regulation 12(4)(b) sets out her view that a request that is vexatious under section 14(1) of the FOIA, would be likely to be manifestly unreasonable under the EIR if it were for environmental information.
14. In light of the above the Commissioner has considered the Council’s arguments relating to section 14(1) and regulation 12(4)(b) together.

The Council’s position

The requests are a disproportionate use of information rights and compliance would create an unreasonable burden

15. The Council said that the wording, nature and tone of the complainant’s correspondence made it difficult and time-consuming to identify requests for information. The Council also said that the complainant presented his requests in the context of lengthy emails, frequently containing attachments, written in unclear and complex language. The complainant mixed assertion and allegations with commentary and questions, and this meant that each piece of correspondence needed to be carefully examined.
16. The Council explained that its information requests were handled by a small team comprising five individuals. The three Information and Records Management Officers (IRMOs) handled approximately 2400 requests each year. The Council drew the Commissioner’s attention to the number of questions in the requests, ranging from one to 33 questions. This, together with the overlapping nature of many of the requests, increased the time required to deal with each piece of correspondence.
17. The Council also clarified that, while repetitious, the complainant’s requests could not be truly characterised as repeated since the wording of each request was slightly different. For example, on 7 June 2017 the complainant asked for the “specific syllabus” for training enforcement officers. The Council provided this information on 5 July 2017. On 16 July 2017 he repeated the request but extended it to include “follow-up qualifications”. The complainant did not refer to the fact that the Council had answered his request of 7 June 2017. The Council considered that

³ <https://ico.org.uk/media/for-organisations/documents/1615/manifestly-unreasonable-requests.pdf>

compliance with the extended request of 16 July 2017 would effectively mean carrying out a near-identical search for relevant information.

Compliance with the requests would not satisfy the complainant

18. The Council said that it had responded to three requests, a total of 13 questions, submitted by the complainant on 7 June 2017 and 8 June 2017. The Council did not withhold any information, and provided explanatory information to assist the complainant's understanding. However, the complainant continued to submit requests, some of which repeated questions that had already been answered.
19. The complainant requested an internal review of the Council's refusal notice on 17 August 2018. However, the Council argued that the complainant continued to correspond and submit information requests while the internal review was under consideration. The Council said that the complainant initially sent eight documents to the Council, all containing lengthy and complex commentary. He then sent a further five documents reiterating his request for internal review. After the Council issued the outcome of the internal review, the complainant sent 11 further emails and a number of attachments. The Council considered that this was evidence that the complainant did not intend to cease correspondence, regardless of the outcome of the internal review.

The complainant was pursuing correspondence with the Council rather than seeking to obtain recorded information

20. The Council again referred the Commissioner to the repetitious nature of the complainant's correspondence. The Council was of the view that the complainant wanted to continue exchanging correspondence rather than receive recorded information. The correspondence did not indicate that the complainant had considered the actual information provided, or that he was dissatisfied with the Council's response. In this respect the Council considered that the complainant's requests were not made with a serious purpose. Rather, they provided the complainant with further opportunities to comment on issues he was interested in.

The complainant's position

21. The complainant maintained that his requests were not vexatious. In his complaint to the Commissioner he alleged that the Council was refusing his requests in order to:

"... avoid uncomfortable questions & inconvenient visibilities for questionable statutory actions that have been taken and/or NOT TAKEN that should have been taken ???".

22. In his request for internal review the complainant referred to the public interest test with regard to the exception at regulation 12(4)(b) of the EIR. The complainant was of the view that there was a strong public interest in the Council answering his questions and thus demonstrating accountability.
23. The complainant also provided the Commissioner with additional documentation highlighting his concerns about the failure of the Council's enforcement department to act in relation to what he described as:

"...perennially escalating abuses of: Trading Standards Regulations, Dangerously Ignoring Parking Restrictions, Flouting F.S.A Food Handling Laws, & Where Very Well-Known Concerns Over the PUBLIC'S HEALTH That Is Put At Risk When Air Polluting Diesel Engines; in Multiple Locations All Around Camden, Are Allowed To Dangerously Idle At Will As Documented With Impunity From Any PCN Enforcement Actions..."

The Commissioner's view

24. The Commissioner is mindful that the FOIA and EIR are motive and applicant blind. It is the request, rather than the requester, that must be judged to be vexatious or manifestly unreasonable in order to rely on section 14 or regulation 12(4)(b) respectively.
25. The Commissioner has considered the Council's arguments in relation to burden, and understands that the complainant has engaged in frequent and voluminous correspondence with the Council. There is no statutory limit to the number of requests that any applicant may make, or to the frequency with which requests can be submitted. However, public authorities are not required to comply with requests that cause an unreasonable, unmanageable or disproportionate amount of work. The extent to which this is the case will depend on the size and resources of the public authority, as well as the volume and complexity of the requests.
26. Having considered the correspondence in this case the Commissioner considers it clear that the complainant has made numerous requests for information – 70 questions – in a period of just six weeks. The complainant has demonstrated a pattern of making repetitive requests that do not appear to take account of information that he has previously received. The Council has responded to requests 1, 2 and 3, a total of 19 questions. The Commissioner accepts that compliance with requests 4, 5 and 6 – 51 questions - would require the Council to spend time going through each request to check what has previously been disclosed and what falls within the scope of a new request.

27. The Commissioner accepts that the complainant's correspondence does not at any point constitute a straightforward request for recorded information. The complainant has clearly taken considerable time to format the correspondence, utilising various styles, colours and sizes of text. Unfortunately none of this assists the public authority in identifying valid requests for information, and is in the Commissioner's view both unnecessary and distracting. Similarly, the correspondence itself is wordy and unfocused, requiring close examination to identify what recorded information is actually being requested among the commentary.
28. The Commissioner has seen no evidence to suggest that the complainant has submitted request with the intention of disrupting the Council, and indeed the complainant has maintained that his requests are reasonable. Furthermore the Commissioner acknowledges the importance of public authorities being accountable to the public. However the Commissioner does not consider that compliance with the complainant's requests is a necessary – or proportionate - means of ensuring accountability in this case.
29. The Commissioner has also considered the Council's argument that compliance with requests 4, 5 and 6 would not satisfy the complainant. The Commissioner is of the opinion that applicants seeking an internal review should allow the public authority a reasonable period in which to conduct the review. The complainant's continued correspondence would be likely to have the effect of distracting the authority from conducting the internal review, and on this basis the Commissioner considered it evidence of unreasonable behaviour.
30. The Commissioner believes that the Council in this case has provided sufficient evidence to show why it considers the requests to be both vexatious and manifestly unreasonable. Accordingly the Commissioner finds that section 14(1) and regulation 12(4)(b) are engaged in respect of requests 4, 5 and 6.
31. Section 14(1) of the FOIA does not require the public authority to carry out a public interest test as set out at section 2(2)(b). However, regulation 12(4)(b) of the EIR provides a qualified exception and as such is subject to the public interest test. Therefore the Commissioner has gone on to consider the public interest in respect of those parts of the request asking for environmental information.

Public interest in favour of disclosure

32. The Council referred to the presumption in favour of disclosure as set out at regulation 12(2) of the EIR. It also recognised that providing information in response to the request would allow transparency regarding the Council's activities.
33. As set out at paragraph 22 above the complainant also considered that there was a strong public interest in the Council complying with his requests. He referred to the public interest in transparency where there is a suspicion of wrongdoing, and said that disclosure of the requested information would "prove or debunk" this.

Public interest in favour of maintaining the exception

34. The Council identified a number of public interest arguments in favour of maintaining the exception:
 - The rate of requests had become a burden on the authority;
 - Unsubstantiated accusations against the authority;
 - Frivolous and condescending requests;
 - Requests based on opinions and conjecture;
 - Unjustified level of frequent correspondence; and
 - Recurring and similar requests.

Balance of the public interest

35. The Commissioner has considered the arguments put forward by the Council, and those put forward by the complainant. She is of course mindful that the effect of accepting reliance on section 14 or regulation 12(4)(b) is to deprive an applicant of their right to request information under the FOIA or EIR. This is not something that should be undertaken lightly, but when a public authority can provide robust arguments, supported by appropriate evidence, to demonstrate that a request is vexatious, it should not be reluctant to consider reliance on these provisions.
36. In its consideration of the public interest the Council has recognised the fact that compliance with the requests would inform the public about the Council's activities. The requests cover a range of topics including street trading, illegal parking and engine idling, and the Commissioner accepts

that the public would have a legitimate interest in being informed as to how the Council is dealing with such issues.

37. However the Commissioner must also take into account the fact that the exception at regulation 12(4)(b) is only engaged if a public authority can demonstrate that the request is manifestly unreasonable. The Commissioner has had regard to her published guidance, which sets out that in practice many of the issues relevant to the public interest test will have already been considered when deciding if the exception is engaged.
38. In this case the Commissioner is satisfied that the Council has presented a strong case as to why the complainant's requests are manifestly unreasonable. The Commissioner considers that the public interest in maintaining the exception is especially strong, given that the Council has already provided the complainant with some relevant information, and also offered advice on presenting his requests in a more manageable format. The complainant has chosen not to adjust his approach but has continued to correspond in a manner that increases the burden on the Council. The Commissioner does not consider this to be reasonable or proportionate, therefore the Commissioner finds that there is a strong public interest in maintaining the exception in this case.
39. The Commissioner has considered the impact on the public interest, or the public good, if the Council is not obliged to comply with the requests. She is of the opinion that the public will not be disadvantaged or uninformed as a result. Accordingly the Commissioner is satisfied that there is no overriding or overwhelming public interest in complying with the requests. The Commissioner concludes that the public interest in maintaining the exception at regulation 12(4)(b) clearly outweighs the public interest in disclosure in this case.

Right of appeal

40. 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

41. 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.
42. 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

Sarah O’Cathain
Senior Case Officer
Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Annex 1: requests submitted by the complainant

Request 1: 7 June 2017

1. Is Camden Council or NSL responsible for the front-line training of CEO's?
2. What is the specific syllabus for training NSL's CEO's?
3. Is Camden Council or NSL responsible for front line supervising of CEO's?
4. Is there a system for the public to complement and/or complain about NSL's CEO's?
5. Does Camden Council set parking enforcement priorities or NSL?
6. What if any discretionary PCN dispensations are CEO's allowed to exercise?

Request 2: 7 June 2017

1. Are there any Trading Standards contemplations to introduce any form of ice cream sales licensing projects which would supersede or in any way replace ice cream van licensing's?
2. Will there be any open public planning consultation meetings before any ice cream KIOSK project is legislated or otherwise approved by Camden?
3. Will there be an open bid process for all interested persons to submit an application to be considered / awarded an opportunity to receive a street trading license for an ice cream KIOSK?
4. What will the specific qualifications be to receive a trading license for an ice cream KIOSK?
5. What will disqualify a person-company from receiving a trading license for an ice cream KIOSK?
6. Will any person-company with a proven history of contravening Camden's street trading regulations, repeat consistent parking infringements and/or with a history of violent business activities be excused as an acceptable contender to receive an ice cream sales KIOSK licenses?
7. Will any persons-company involved with antisocial behaviour's, verbal abuses, physical threats and/or actually harming persons whom object to their respective illegal business activities be considered suitable to receive any form of trading standards lensing approvals?
8. What person(s)-company(s) are currently issued weekly street trading / ice cream van licenses ?
9. What are the specific qualification details required by Trading Standards Officials in order to receive a street trading license & are the terms of agreements monitored / enforced?
10. What if any enforcement actions have been implemented against illegally operating ice cream van owners during weekends / bank holidays

... OR ... is there an open door - free for all tolerance to allow ice cream van owners / drivers to do as they please above the law on week-ends?

11. What official office is researching / conducting fact finding considerations for an ice cream KIOSK licensing program. Is there an internal or external experienced ice cream sales advisory team?
12. Have any Camden Council Officials and/or Trading Standards officers entered into any form of official or unofficial understanding with any person-company to save Camden Council enforcement budgeting & staffing expenses with a blind-eye tolerance ... to allow a PHYSICALLY - DOMINATE ice cream fleet to suppress / expel other competing ice cream van owners to stay out of Camden?

Request 3: 8 June 2017

1. What is Camden Council's position on enforcing diesel engine idling laws ... & ... public air quality issues?

Request 4: 16 July 2017

1. Is Camden Council or NSL responsible for the front-line training of CEO's?
2. What is the specific syllabus for training & follow-up qualifications for NSL's CEO's?
3. Are NSL's CEO's Trained Before & After Being Assigned To Front-Line-Duties ... TO KEEP UPDATED?
4. Is Camden Council or NSL responsible for front line monitoring & supervising of CEO's?
5. Is there a system for the public to complement and/or complain about NSL's CEO's?
6. Does Camden Council set parking enforcement dispensation privileges to illegally park or does NSL?
7. What discretionary PCN dispensations are CEO's allowed to accept bungs favors to avoid PCN's?
8. Are there or will there be any joined-up enforcement actions between Camden's Street Trading Officials, Food Safety Inspectors & Camden's CEOs to coordinate an effective crack down on illegal ice cream van owners?
9. Are there any Trading Standards consultations to introduce alternative ice cream street sales, licensing platforms; to further allow ice cream van owners to operate above the law; to supersede ice cream van licensing's permits?
10. Will there be any open public planning consultation meetings before any ice cream KIOSK projects are legislated or otherwise back-door approved to be given to the person known as [name redacted]?

11. What Camden Council official offices are researching / conducting fact finding considerations for an ice cream KIOSK. What meetings & with whom are officials consulting for expert opinions & professional guidance?
12. Does Camden Council have its own expert / advisory team concerning ice cream van operations for KIOSKS?
13. Will there be an open bid process for all interested persons to submit an application to be considered/awarded an opportunity to receive a street trading license for an ice cream KIOSK ... or is there a preferred shoe in person?
14. What will the specific qualifications be to receive a street trading license for an ice cream KIOSK in Camden?
15. What will disqualify a person/company from receiving a trading license for an ice cream KIOSK in Camden?
16. Will any person/company with a proven history of persistently contravening Camden's street trading regulations, consistent parking infringements, disregarding public fresh air concerns by idling dangerous air polluting ice cream van engines for hours at a time or with a history of violent anti-social business activities be allowed to prevent any other ice cream van owners to be a contender to receive an ice cream sales KIOSK licenses in Camden?
17. Will any persons/company involved with antisocial behavior's, verbal abuses, physical threats and/or actually harming a MET Police Officer or Civilian Person(s) whom object to their respective illegal business activities be considered suitable, up-standing ... COMMUNITY VESTED PERSON ... to receive a KIOSK Trading Licenses?
18. What person(s) company(s) are currently issued weekly street trading / ice cream van licenses in Camden?
19. What are the specific qualification details required by Trading Standards Officials in order to receive a street trading license & are the terms of agreements monitored /enforced ... ARE WEEKENDS EXEMPT FROM ENFORCEMENT?
20. What if any enforcement actions have been taken against illegally operating ice cream van owners during weekends, bank holidays ... OR ... is there an open door - blind-eye free for all tolerance to allow itinerate, illegally operating ice cream van owners to do as they please above the law during the week and/or on week-ends ?
21. Have Camden Council's Trading Standards Officers entered into an understanding with any person-company to save Council enforcement budgeting expenses ... £££ \$\$\$ £££ ... with a blind-eye agreement to allow [name redacted] to expel other competing ice cream van owners ... WHILST ... claiming Camden as his exclusive street trading territory?
22. What Are Camden Councils air pollution laws concerning idling diesel engine ... are assigned monitoring & enforcement officials on duty to issue PCN's to those whom pollute Camden's air or is it only in Islington?

23. Are NLS's CEO's Required To Issue PCN's To Drivers Whom Park Idling Their Diesel / Petrol Engines?
24. Are NLS's CEO's Allowed To Selectively Issue PCN's To Some Illegally Parked Vehicles Then Ignore Others?
25. Are NLS's CEO's Allowed To Accept Free Gifts, Food or £££ \$\$\$ £££ To Ignore Any Illegally Parked Vehicle?
26. Are NLS's CEO's Allowed To Use A Motor Scooter As A Two Wheeled Weapon To Threaten Anyone?
27. Are NLS's CEO's Taught To Stop Anyone ... LEGALLY PHOTOGRAPHING ... Their Illegal & Questionable Activities?
28. Are NLS's CEO's Taught To Verbally Abuse, Assault Anyone ... LEGALLY PHOTOGRAPHING ... Their Activities?
29. Are NLS's CEO's Taught To Physically Detain Or Otherwise Arrest Anyone ... LEGALLY PHOTOGRAPHING ... Them?
30. Are NLS's CEO's Taught To Peruse Any Person With The Intent To Fake An Assault Against Said Person?
31. Are NLS's CEO's Required To Report Their Lunch Break And/Or Their Rest Period Times & Locations?
32. Are NLS's CEO's Disciplined By Caamden Council And/Or NSL When Found Guilty Of Any Infractions?
33. Are NLS's CEO's Enlightened To Work In The Community For The Community As Claimed By NSL HQ?

Request 5: 16 July 2017

1. What is the specific syllabus for training & follow-up qualifications for Trading Standards Street Inspectors?
2. Is there a system for the public to complement or complain about Trading Standards Street Inspectors?
3. Does Camden Council allow WEEK DAY or SPECIAL WEEKEND dispensation exemptions for illegally parked & unlawful street trading ice cream vans ... As have been observed up & down Camden High Street, all around Primrose Hill, surrounding Camden's Museums & Russel Square Parks ... ??? ... { AS VIDEO DOCUMENTED !!! }
4. What discretionary on the spot PCN dispensations are allowed to be given by Trading Standards Inspectors?
5. Are there or will there be any joined-up enforcement actions between Camden's Street Trading Officials, Food Safety Inspectors & NSL's CEO's to coordinate an effective crack down on illegal ice cream van operations?

Request 6: 19 July 2017

1. WHAT ARE THE INTERDEPARTMENTAL / COORDINATED ENFORCEMENT RELATIONSHIPS
2. BETWEEN CAMDEN'S DEPARTMENT OF TRADING STANDARDS & NSL'S FRONT-LINE CEO's ??? { NOTING THAT IF ONLY NSL'S CEO'S WOULD EQUALLY / CONSISTENTLY ISSUE PCN'S TO ALL VEHICLES & TOO ILLEGALLY PARKED ICE CREAM VANS - - - THE KNOCK ON EFFECT WOULD BE TO REDUCE THE BUDGET EXPENDITURES REQUIRED FOR TRADING STANDARDS ENFORCEMENTS ... !!! }
3. WHAT ARE THE OFFICIAL AND/OR UNOFFICIAL RELATIONSHIPS BETWEEN CAMDEN COUNCIL / TRADING ENFORCEMENT OFFICIALS & CAMDEN'S SELF-PROCLAIMED ICE CREAM VAN BARRON KNOWN AS [name redacted] ... HOW MANY ICE CREAM KIOSK PLANNING / CONSULTING MEETINGS HAVE & ARE YET SCHEDULED WITH [name redacted] & HAVE ANY OTHER MORE LEGALLY OPERATING ICE CREAM VAN OWNERS/DRIVERS ARE BEING CONSULTED TO
4. INITIATE ANY ICE CREAM KIOSKS TRADING LICENSES???
5. IS THERE A STATISTICAL CORRELATIONS BETWEEN CAMDEN'S OFFICIAL WEB SITE ...
6. <https://OpenData.Camden.Gov.Uk> ... & THE REPORTED F.O.I. RESPONSE STATISTICS WHICH WERE REPORTED TO ... ' STOP POLLUTING CAMDEN ' ... ???
7. WHAT IS CAMDEN COUNCIL'S EXACT / PERCEIVED NATURE OF ICE CREAM VANS THAT MAKES IT DIFFICULT TO ISSUE PCN'S FOR ILLEGALLY PARKING ... WHEN IN FACT CAMDEN'S RED ROUT TRAFFIC / PARKING WARDENS ROUTINELY ISSUE PCN'S TO ILLEGALLY PARKED VEHICLES ... EVEN WHEN THEY DRIVE AWAY THEY CAN / ARE ISSUED PCN'S IN THE POST ... EQUALLY ... CAMDEN'S CCTV CAN REMOTELY ISSUE PCN'S ... SO AGAIN ... WHAT IS THE DIFFICULTY THAT KEEPS NSL'S CEO'S FROM PROFESSIONALLY DOING THE EXACT SAME THING THAT RED ROUT CEO'S & CCTV CAMERAS DO ???
8. ARE NSL'S CEO'S TRAINED TO KNOW / UNDERSTAND THE STREET TRADING TIME LIMITATIONS FOR ICE CREAM VAN PER DAY { EA: 15 MINUTES PER DAY IN ONE LOCATION } .
9. ARE NSL'S CEO'S MANDATED / ALLOWED TO ISSUE PCN'S TO ICE CREAM VAN OWNER/DRIVERS WHOM PARK IN ONE LOCATION FOR MORE THAN 15 MINUTES AND/OR ARE TRADING ENFORCEMENT OFFICERS ALSO MANDATED TO EQUALLY ISSUE PCN'S FOR THE
10. SAME CONTRAVENTION ... CONCLUDING TO ASK WHICH ORGANIZATION KEEPS THE REVENUE £££££ CREATED WHEN ISSUING SAID PCN'S???
11. HOW MANY FPN'S HAVE BEEN ISSUED TO ILLEGALLY PARKED ICE CREAM VANS IN CAMDEN BY NSL'S CEO'S???

12. HOW MANY FPN's ISSUED BY NSL's CEO's TO ICE CREAM VANS HAVE BEEN CANCELLED BY CAMDEN COUNCIL & ON WHAT STATUTORY GROUNDS WERE THEY RESCINDED ???
13. HOW MANY MINUTES PER DAY ARE ICE CREAM VANS ALLOWED TO LEGALLY PARK IN ONE LOCATION???