

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 13 November 2018

Public Authority: Department for International Development
Address: 22 Whitehall
London
SW1A 2EJ

Decision (including any steps ordered)

1. The complainant submitted a request to the Department for International Development (DFID) seeking a copy of an internal investigation report into allegations made against DAPP Malawi. DFID sought to withhold the report on the basis of the following sections of FOIA: 31(1)(a) and (b) (law enforcement); 40(2) (personal data); section 41(1) (information provided in confidence); and 43(2) (commercial interests) of FOIA. The Commissioner has concluded that part of the report is exempt from disclosure on the basis of sections 31(1)(a) and (b) of FOIA and that in all the circumstances of the request the public interest favours maintaining these exemptions. However, the Commissioner has concluded that the remaining parts of the report are not exempt from disclosure on the basis of the exemptions cited by DFID. She has therefore concluded that these parts of the report should be disclosed.
2. The Commissioner requires the public authority to take the following steps to ensure compliance with the legislation.
 - Provide the complainant with a copy of the Internal Audit Investigation Report into DAPP Malawi with the parts of the report which the Commissioner has identified in the confidential annex to this notice redacted on the basis of sections 31(1)(a) and (b) of FOIA.
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 DFID on 22 December 2017:

'We write on behalf of our client...

1.To request under the Freedom of Information Act 2000 (FOIA) the DfID internal assessment in early August 2016 of allegations concerning DAPP to which DfID refers in items 10.a and 12 of its Information Note from Anthony Garnett and another of 29 July 2016 (Disclosure 4 to DfID's letter to us of 28 November 2017);

2.To ask you please to confirm whether DfID funding to DAPP Malawi remains suspended or has been terminated, and if it was terminated, the date on which decision to terminate it was taken; and

3.If it is the case that funding to DAPP Malawi remains suspended or has been terminated, then we make a further request under FOIA for any final report which underpins the decision to continue to suspend or terminate such funding.¹

5. DFID contacted the complainant on 25 January 2018 and confirmed that it held information falling within the scope of the request but it considered this to be exempt from disclosure on the basis of sections 31 (law enforcement), 36 (prejudice to the effective conduct of public affairs) and 43 (commercial interests) of FOIA but it needed additional time to consider the balance of the public interest test.
6. DFID sent the complainant similar letters further extending the time it needed to consider the public interest test on 8 February, 23 February and 8 March 2018.

¹ In August 2016 the BBC made a number of allegations about a charity, DAPP Malawi. The BBC's key allegation was that the charity coerced its staff to pay a portion of their wages to 'cult-like organisation', the Teachers Group. In response DFID announced that it had suspended funding the charity and launched an investigation regarding the BBC's allegations. The BBC's reporting was produced in partnership with Reveal from the Center for Investigative Reporting.

7. DFID provided the complainant with a substantive response to the request on 29 March 2018. In relation to part 1 of the request DFID explained that it held an Internal Audit Investigation Report ('the report') but it considered this to be exempt from disclosure on the basis of sections 31(1)(a) and (b), 40(2), 41(1) and 43(2) of FOIA. In relation to part 2 of the request DFID explained that funding to DAPP Malawi was suspended on 2 August 2016 to allow for a period of investigation and then the decision to terminate all DAPP Malawi programmes in place at the time was made on 5 October 2016. In relation to part 3 of the request DFID explained that DAPP Malawi did not remain under suspension and was free to bid for work with DFID.
8. The complainant contacted DFID on 24 May 2018 in order to ask for an internal review of this response.
9. Having failed to receive a response, the complainant contacted DFID again on 2 July 2018. In response, DFID explained that in exceptional circumstances it can take up to 40 working days to complete an internal review response. DFID noted that it was now also considering relying section 36 of FOIA.

Scope of the case

10. The complainant contacted the Commissioner on 30 July 2018 in order to complain about DFID's failure to complete its internal review and more fundamentally its failure to provide it with a copy of the requested report.
11. To date, DFID has not completed its internal review of the complainant's request. However, as part of its response to the Commissioner's investigation of this complaint it has clarified the basis upon which it is seeking withhold the requested report; it considers the entirety of the report to attract the exemptions contained at sections 31(1)(a) and (b) and also section 43(2) of FOIA. It is also of the view that parts of the report attract the exemptions contained at sections 40(2) and 41(1) of FOIA. DFID is not seeking to rely on section 36 to withhold the report. This decision notice therefore considers whether these exemptions provide a basis to withhold the report in question.

Reasons for decision

Section 31 – law enforcement

12. DFID have withheld the entire report on the basis of sections 31(1)(a) and (b) of FOIA. These sections state that:

'Information which is not exempt information by virtue of section 30 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'*

DFID's position

13. In its refusal notice DFID explained that it was seeking to rely on these exemptions because public disclosure of how investigations are carried out would be of value to individuals and organisations determined to avoid detection of wrongdoing; disclosure of the withheld information would undermine the integrity of its review process and thus the effectiveness of current and future investigations.
14. In its submissions to the Commissioner DFID provided more comprehensive submissions to support its reliance on section 31(1)(a) and (b). Part of these submissions made reference to the content of the withheld information itself and therefore the Commissioner has not included such submissions in this notice. However, for the purposes of this decision notice DFID's position can be summarised as follows:
15. It explained that it was relying on the lower threshold that disclosure would be likely to prejudice law enforcement.
16. DFID explained that the withheld report contained a very detailed analysis of the specific investigation activities undertaken by its Internal Audit Department (IAD) into the allegations against DAPP Malawi. It argued that disclosure of the report would reveal details of DFID's approaches to the investigation of alleged irregularities and this could undermine the effectiveness of its investigative processes. More specifically, it argued that disclosure of the withheld report could reveal details of the methodologies which it used which could be of value to individuals determined to circumvent processes and so avoid detection of criminal activity. DFID argued that even piecemeal disclosures of information regarding its investigations could be used by malicious parties to build up an insight into its investigative processes.

17. The Commissioner specifically asked DFID to explain whether it had considered the disclosure of a redacted version of the report. In response, DFID explained that it considered that due to the sensitive nature of the report it would not be possible to issue a meaningful redacted version of the document. In the context of section 31, it also argued that disclosure of the format and content of investigation reports would expose its investigatory process and thus still undermine its ability to conduct independent and objective investigations without undue influence.
18. Furthermore, DFID argued that disclosing even redacted versions of the investigation reports, which are by their nature are investigations into sensitive matters, would have a chilling effect on parties who provide it with information to assist such investigations; essentially disclosure of the information would betray the principle of confidentiality which underpins the investigative process.

The complainant's position

19. Based upon the content of the refusal notice, the complainant argued that it failed to see how the prevention or detection of crime, and the apprehension or prosecution of offenders could be prejudiced by release of the withheld information. It argued that if a crime took place, it cannot now be prevented, and nor would release of the withheld information compromise the detection of any crime that may have taken place in connection with the subject matter of the report. Similarly, the complainant argued that release of the withheld information could not possibly prevent anyone being apprehended or prosecuted for anything connected with its subject matter.
20. The complainant explained that it assumed that DFID was relying on something far less specific, i.e. the general notion that releasing the report would reveal the working methods of DFID's counter fraud section, and that this will prejudice the prevention of fraud in future, hypothetical cases. The complainant argued that it considered this line of reasoning to be highly speculative. It argued that any funding partner of DFID would expect it to have robust procedures in place to detect fraud, and no doubt DFID is at pains to point this out to its partners, in order to deter fraud in the first place. Likewise, the complainant argued that any partner of DFID's determined to commit fraud would take steps to prevent detection of that fraud and that disclosure of the report would not be likely to alter this situation.
21. The complainant argued that even taken at its very highest, DFID's argument could not possibly justify withholding the entire report, which it assumed consisted primarily of the conclusions of the investigation, rather than an exposition of the methods it used. The complainant

argued that if specific investigative techniques are revealed by specific passages of the report, and these are genuinely techniques that a potential fraudster could not have foreseen, then DFID should consider applying sections 31(1)(a) or (b) to those passages alone, rather than as a blanket exemption. However, the complainant emphasised that this would not of course apply to obvious, basic counter-fraud techniques such as audits of bank accounts which can be assumed to form part of any investigation.

The Commissioner's position

22. In order for a prejudice based exemption, such as section 31(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. The anticipated prejudice must be more likely than not.
23. With regard to the first criterion of the three limb test described above, the Commissioner accepts that the potential prejudice described by DFID relates to the interests which sections 31(1)(a) and (b) are designed to protect. With regard to the second criterion, the Commissioner accepts that taking into account the range of arguments advanced by DFID there is some causal relationship between the potential disclosure of the information being withheld and the prejudice which the exemption is designed to protect. Furthermore, she is satisfied that the resultant prejudice would be real and of substance.
24. With regard to the third criterion, the Commissioner is satisfied that there is a more than hypothetical risk of prejudice occurring if the *majority* of the withheld information was disclosed. However, in reaching

this conclusion the Commissioner does not accept, in full, all of DFID's reasoning to support its reliance on these exemptions. More specifically, having carefully reviewed the content of the information she is not persuaded that it is plausible to argue that disclosure of the withheld information would reveal details of DFID's investigatory techniques or methodologies to the extent that this would undermine future similar investigations conducted by DFID. Rather, in the Commissioner's view disclosure of the withheld information would only be likely to reveal relatively obvious methods or approaches taken in the circumstances of this particular case rather than any specialised techniques or approaches that could harm future investigations. As a result the Commissioner is unpersuaded that disclosure of the withheld information presents a real and significant risk of creating a mosaic effect where by even piecemeal disclosures could undermine DFID's investigations. Furthermore, the Commissioner remains unconvinced that revealing the form and format of the report could provide those with a malicious intent with a genuine insight into DFID's investigatory practices.

25. Nevertheless, the Commissioner considers that DFID's argument that disclosure of its investigation reports could have a chilling effect on those who have provided it with information in confidence, and which underpin the investigative process, is a compelling one. Therefore, the Commissioner accepts that disclosure of such information contained in the requested report, and moreover the parts of the requested report that analyse and draw conclusions based upon such information, would as DFID argues, be likely to have a real and significant impact on DFID's ability to conduct similar investigations in the future.
26. However, not all of the information contained in the report falls within this description. Consequently, for the parts of the report which contain information which was not provided to DFID by third parties, or does not comment on the same, the Commissioner is of the view that such information could be disclosed without there being a real and significant risk of prejudice occurring to the interests which sections 31(1)(a) and (b) are designed to protect. The Commissioner has identified these parts of the report in a confidential annex, a copy of which will be provided to DFID only.
27. Sections 31(1)(a) and (b) are therefore engaged in respect of part of the withheld report.

Public interest test

28. Section 31(1) is a qualified exemption and therefore subject to the public interest test set out in section 2(2)(b) of the FOIA. The Commissioner has therefore considered whether in all the circumstances

of the case the public interest in maintaining the exemption outweighs the public interest in disclosing the withheld information.

Public interest arguments in disclosing the withheld information

29. DFID accepted that there was a public interest in openness and accountability and in giving assurance that serious allegations are given appropriate consideration.
30. The complainant argued that there is a specific public interest in understanding whether DFID's counter-fraud measures are sufficiently robust. It noted that in this present case, it appeared that the alleged abuses by DAPP Malawi went unchecked until exposed by the BBC and the Center for Investigative Reporting. The complainant argued that this raised legitimate questions as to whether the controls being applied by DFID were adequate and this increased the public interest in the disclosure of the report.
31. Furthermore, the complainant argued that the subject of the report was inherently of great importance to the public. It argued that there are very weighty public interests in increasing transparency about how public money is spent. Clearly, these are greatly enhanced where there is a credible suspicion of wrongdoing, as there is in the present case. The complainant argued that this raised the additional public interests in knowing about the wrongdoing itself (if any), but also the role of the UK Government, both before the allegations arose – was DFID doing enough to monitor its project partners for potential fraud? – and subsequently – has DFID adequately investigated the allegations? The complainant argued that the second of these interests was heightened further by DFID's confirmation that DAPP Malawi is now once again eligible to receive funding from DFID. The complainant argued that the public is entitled to be reassured that the initial allegations have been dealt with thoroughly, so that it can have confidence that its money is not being put at risk by allowing DAPP Malawi to bid again.
32. The complainant argued that there was another extremely important dimension to the public interest. It explained that in the United States, the parent organisation of DAPP Malawi, and an individual who works for DAPP Malawi, are suing the Center for Investigative Reporting for defamation. They seek 'punitive damages in excess of \$25 million'. The complainant argued that this is a blatant attempt to silence investigative journalists by threatening them with financial ruin and it was of the utmost public interest that such attempts do not succeed. This is in addition to the public interest in knowing about the specific subject matter in issue in the litigation.

33. The complainant acknowledged that DFID would not wish to take sides in this litigation. However, the complainant argued that it did not have to in order to recognise the public interest in disclosure. This is because the dispute raises important issues of public interest, so that it is in the public interest that whichever party involved in the litigation is in the right should prevail. The complainant argued that it follows that there is a significant public interest in the case being fought on the basis of the fullest and most accurate factual picture – something that would be greatly assisted by the disclosure of the information being withheld by DFID.
34. The complainant also argued that in the context of its rights to free speech, its client's right to information is a fundamental right, protected under EU law, as recognised by the CJEU in the landmark judgment in *Magyar Helsinki Bizottság v Hungary* (18030/11).
35. Finally, the complainant argued that DFID rightly takes a strong public stance in favour of transparency in the aid sector. The complainant noted that DFID's response to the recent scandal over sexual exploitation in the aid sector has rightly emphasised the need for greater transparency and protection for whistle-blowers.² The complainant also noted the laudable aims of increased transparency set out in DFID's February 2018 policy paper 'Open Aid, Open Societies: a vision for a transparent world', for instance:

'We will support parliaments to be more inclusive for all citizens, to open up national budgets, to scrutinise expenditure, and to increase engagement with every constituent, leaving no one behind. We will explore opportunities to scale up support to the independent, intermediary institutions that oversee government delivery, like the UK National Audit Office and the Office for Standards in Education, Children's Services and Skills (Ofsted) which scrutinises the quality of education. [...]
DFID will support audit institutions to improve their capacity, publish accessible reports, and follow through on problems identified'.³

² <https://dfidnews.blog.gov.uk/2018/02/12/international-development-secretary-on-oxfam-and-ukaction-to-tackle-sexual-exploitation-in-the-aid-sector/>

³

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/68

[2143/Open-Aid-Open-Societies.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/682143/Open-Aid-Open-Societies.pdf) – page 10

36. The complainant explained that it would encourage DFID to implement these values at home, as well as promoting them abroad. If DFID is seen to behave in a secretive manner in respect of the aid projects it funds, the complainant argued that this would damage DFID's drive to increase transparency in the aid sector, and so damage the vital objectives DFID seeks to achieve overall, in a way that would be strongly counter to the public interest.

Public interest arguments in maintaining the exemption

37. DFID argued that in considering the balance of the public interest it is imperative that it struck a balance as it would clearly not be in the public interest to undermine law enforcement investigations. More specifically it argued that there is a very strong public interest in ensuring that it is able to carry out robust investigations in order to safeguard the use of public funds. DFID explained that the UK government has a zero tolerance approach to fraud and corruption and it had rigorous checks in place to protect taxpayers' money and takes firm action if it is misused. There is, DFID argued, a very strong public interest in protecting the integrity of the review process so as to ensure that any investigations are as effective as possible.

Balance of the public interest arguments

38. The Commissioner accepts that there is a significant public interest in DFID being open and transparent about how it uses public money to fund overseas development and in particular about action it takes once allegations of misuse of such funds have been made. In the circumstances of this case the Commissioner accepts that such arguments attract notable further weight given the nature of the allegations made by the BBC and Center for Investigate Reporting, and also given that, as the complainant suggests, DFID would appear to have been previously unaware of such issues. Furthermore, the Commissioner agrees with the complainant that the fact that DAPP Malawi is now free to bid again for public money increases the public interest in the disclosure of information about the nature and findings of DFID's investigations into the allegations. The Commissioner accepts that disclosure of the parts of the report which she accepts are exempt on the basis of sections 31(1)(a) and (b) would provide a detailed insight into DFID's actions and go a significant way to meeting these interests.
39. However, the Commissioner also agrees with DFID that there is a very strong public interest in ensuring that it is able to carry out robust investigations in order to safeguard the use of public funds. The Commissioner is conscious that her basis for concluding that sections 31(1)(a) and (b) are engaged is on the basis that disclosure of such

information would be likely to undermine DFID's ability to secure the input of third parties in such investigations in the future. Such a consequence is clearly one that has broad and widespread implications for DFID's ability to ensure that taxpayers' money is protected. In the Commissioner's opinion such broad ranging consequences mean that there is a very strong public interest in maintaining the exemptions in the particular circumstances of this case, and in light of these she has concluded that the public interest narrowly favours maintaining the exemptions contained at sections 31(1)(a) and (b).

40. With regard to the complainant's line of argument concerning Article 10 of the European Convention, the Commissioner's position in respect of *Magyar* decision is that it is not yet clear whether the UK courts will follow this decision. The Commissioner therefore remains of the view that Article 10 ECHR does not provide a general right of access to information from public authorities which was the finding of Supreme Court in *Kennedy v The Charity Commission [2014] UKSC 20*.

Section 43 – commercial interests

41. As explained above, DFID has also argued that all of the requested report is exempt from disclosure on the basis of section 43(2) of FOIA. This states that:

'Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).'

42. The Commissioner has therefore considered whether the parts of the report which she has concluded are not exempt from disclosure on the basis of sections 31(1)(a) and (b) are instead exempt from disclosure on the basis of section 43(2) of FOIA.

DFID's position

43. DFID argued that disclosure of the withheld report would harm both DAPP Malawi's commercial interests and its own commercial interests. As with its submissions to support its reliance on section 31(1)(a) and (b) of FOIA, DFID's submissions to the Commissioner to support its reliance on section 43(2) referred directly to the content of the withheld information. Again, rather than refer to these submissions in this notice in detail she has summarised them accordingly.
44. With regard to DAPP Malawi's commercial interests DFID explained the charity operated in a competitive market both in terms of competing for charitable donations against other charities and in bidding for opportunities to deliver aid services against other potential suppliers. DFID explained that the withheld information contained details of DAPP's

activities and it was clear that such information was highly commercially sensitive and if disclosed could harm its position in either of the two types of commercial activity described above. DFID also argued that disclosure of an investigation report into the allegations made against DAPP Malawi could make it more difficult for it to raise money or secure contracts.

45. With regard to its own commercial interests, DFID argued these would be compromised if its delivery partners no longer trusted that commercial information they had provided to DFID would be disclosed into the public domain. If DFID lost its reputation for respecting commercially sensitive information provided to it then its reputation would suffer and other partners, on whose co-operation DFID and the UK government depend, could be reluctant to share information with it for fear of premature disclosure.

The complainant's position

46. With regard to DAPP Malawi's commercial interests, the complainant argued that the financial information of an aid organisation that applies for grants of public money does not carry the same commercial sensitivity as does the financial information of a private company that competes in a commercial market. The complainant argued that DAPP Malawi's financial interests lie in securing funding for its not-for-profit activities and it disputed whether such interests are 'commercial', but even if they are, it does not see how they are prejudiced by disclosure of the report in the present circumstances, given that DFID had already stated that DAPP Malawi is eligible to receive further funding from DFID. Given this the complainant suggested that DAPP Malawi's standing with DFID cannot be prejudiced by disclosure, and it can meet any objection from other funders by pointing to the fact that DFID itself no longer considers DAPP Malawi to be a funding risk. The complainant suggested that this illustrated the more general point that the report is now historic information, which has lost any commercial sensitivity that it may once have had. The complainant also noted that DFID had given no indication that it had consulted DAPP Malawi in order to identify what, if any, commercial prejudice they believe they might suffer as a result of disclosure.
47. With regard to DFID's commercial interests, the complainant suggested that it distributes money for projects abroad that serve broad public policy aims. In this context the complainant argued that DFID's interests are different in kind to departmental interests in procuring outsourced services at lowest cost. The complainant argued that even if DFID does have relevant commercial interests, it did not accept that they could be damaged by disclosure. The complainant argued that given that the suggestion that project partners will spurn funding from DFID because it

has disclosed the report simply lacks reality. DFID is a vital source of funding for aid organisations, who will continue to apply to it for grants whether or not it discloses the report.

The Commissioner's position

48. As section 43(2) is a prejudice based exemption, she has considered whether the three limb test set out above at paragraph 22 is met.
49. With regard to the first limb of the test, as the Commissioner's guidance explains a commercial interest relates to a person's ability to participate competitively in a commercial activity. The underlying aim may be to make a profit, however, it could also be to cover costs or to simply remain solvent. In respect of DFID's own interest in relation to the section 43 exemption, she agrees with the complainant that DFID's interests are not ones that are commercial. Whilst the Commissioner accepts that (for the reasons discussed above) if parts of the report were disclosed third parties may be less willing to share some information with DFID, the Commissioner can see no obvious link between this outcome and any impact on a commercial activity in which DFID is involved.
50. In terms of DAPP Malawi's commercial interests, in contrast the Commissioner accepts that it is involved in some commercial activities in this context, both securing funding from donors and also bidding for opportunities to deliver aid services.
51. However, having considered the parts of the report which she has concluded are not exempt on the basis of section 31 (ie the information identified in the confidential annex), the Commissioner is not persuaded that there is a causal link between disclosure of this particular information and harm occurring to DAPP Malawi's commercial interests. She has reached this finding because in her view the information in question does not contain any information about DAPP Malawi's activities or operations that could be considered to be in anyway commercially sensitive information. Furthermore, whilst she accepts the logic of DFID's argument that disclosure of information from a report about alleged abuses by DAPP Malawi could potentially harm its commercial interest, given the content of the information in question she does not consider it plausible to argue that its disclosure would affect third party's perceptions of DAPP Malawi.
52. The Commissioner has therefore concluded that section 43(2) is not engaged in respect of the information in the confidential annex.

Section 40(2) – personal data

Section 41(1) – information provided in confidence

53. The Commissioner has not considered whether DFID has correctly applied sections 40(2) and 41(1) of FOIA given that she has already concluded that the parts of the report to which these exemptions have been applied are exempt from disclosure on the basis of section 31(1)(a) and (b) of FOIA.

Other matters

54. The complainant expressed its concern to the Commissioner about the length of time it took DFID to complete the internal review. FOIA does not impose a statutory time within which internal reviews must be completed albeit that the section 45 Code of Practice explains that such reviews should be completed within a reasonable timeframe. In the Commissioner's view it is reasonable to expect most reviews to be completed within 20 working days and reviews in exceptional cases to be completed within 40 working days.
55. In this case the complainant submitted its request for an internal review on 24 May 2018. At the point the complainant contacted the Commissioner on 30 July 2018 about this matter some 46 working days had elapsed. The Commissioner wishes to use this as an opportunity to remind DFID of the need to complete internal reviews within the timeframes set out in her guidance.
56. The Commissioner also notes that DFID's delay, and indeed failure to complete an internal review, follows DFID taking 66 working days to consider the balance of the public interest test, a period of time which in decision notice FS50731784 the Commissioner found to be an unreasonable length of time and thus a breach of section 17(1) of FOIA.

Right of appeal

57. 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

58. 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.
59. 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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