

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 22 July 2019

Public Authority: The Council of the University of the Arts London
Address: 272 High Holborn
London
WC1V 7EY

Decision (including any steps ordered)

1. In a multi-part request to the University of the Arts London (UAL) the complainant has requested information on legal matters brought against UAL's colleges. UAL released some relevant information and relied on section 40(2) of the FOIA (third person personal data) to withhold specific information the complainant has requested.
2. The Commissioner's decision is as follows:
 - ULA can withhold the specific details the complainant has requested under section 40(2) as this information is the personal data of third persons.
 - UAL breached section 10(1) and section 17(1) of the FOIA as it did not communicate information it holds or provide a refusal notice where appropriate within 20 working days.
3. The Commissioner does not require UAL to take any remedial steps.

Request and response

4. On 26 October 2018, the complainant submitted a multi-part request to UAL. Given the voluminous nature of this request, it is reproduced in the Appendix to this notice.

5. UAL responded on 30 November 2018. It summarised the request as being for the same information across the years 2011-2018 for four of its colleges.
6. Part a) of the request concerns the number of 'legal matters' brought against the four colleges by students or ex-students. UAL advised that the term 'legal matter' can be defined widely to include:
 - students or ex-students with a potential claim or letter of claim who have instructed solicitors in relation to that claim and the University has had to notify its Insurers, UMAL;
 - or where students or ex-students have made a complaint threatening to instruct solicitors to pursue legal proceedings.
7. UAL said it had based its response on the second, narrower, definition. It said the data sets are small in each of the years that the complainant has requested and that it considered that individuals could be identified from these small numbers. It withheld the specific numbers across each year, and the colleges, under section 40(2) of the FOIA. It released one aggregated number - 18. UAL also clarified that 12 of these 18 matters have either been discontinued, dismissed or withdrawn.
8. Part b) of the request is for the number of those legal matters that were settled prior to legal proceedings, across the eight years. UAL said it had defined legal proceedings as claims issued; that is proceedings issued in court. It released this number - two.
9. Part c) of the request concerns the matters settled prior to legal proceedings and whether the colleges concerned requested the student/ex-student to agree to a non-disclosure as part of the settlement. UAL clarified that matters settled before legal proceedings have commenced are handled by UAL's insurers and external lawyers. UAL confirmed that it had not asked the individuals in the two matters above to sign non-disclosure agreements.
10. Parts d) and e) of the request also concern the matters described in b) and concern what issues the students/ex-students had raised and what monetary sums were paid. UAL gave responses to these parts, with the monetary sum paid given as an aggregate figure.
11. Part f) of the request is for the number of legal matters across the eight years for each of the colleges that were settled after legal proceedings had started, and the dates when they were started. UAL gave an aggregated number - four - and withheld the year of settlement under section 40(2) as it considered that individuals could be identified if this information was disclosed.

12. Part g) concerns the matters in part f) and whether the colleges concerned requested the student/ex-student agree to a non-disclosure as part of the settlement. Having clarified that matters settled after legal proceedings have commenced are handled by UAL's insurers and external lawyers, UAL confirmed that it had not requested students/ex-students to sign non-disclosure agreements but that two of the four matters were subject to non-disclosure agreements.
13. Parts h) and i) also concern the matters at part f) and concern what issues the students/ex-students had raised and what monitory sums were paid. UAL gave responses to these parts, with the monitory sum paid provided as an aggregate figure.
14. Part j) of the request again concerns the matters at part f) and is for information on what, other than monitory sums, were provided by the colleges as part of the settlement. In its response the University said that in light of the small number at part f), it was also withholding this information under section 40(2).
15. In her request for an internal review the complainant queried UAL's reliance on section 40(2) with regard to her request for the years on which claims started and finished, and her request for the colleges at which the actions occurred. On 5 December 2018 UAL wrote to the complainant and advised that at section f), the matters that were settled after legal proceedings, were settled between 2015 and 2018.
16. Following its review the UAL wrote to the complainant on 17 December 2018. Referring again to part f) of the request UAL confirmed that it is relying on section 40(2) to withhold the specific information the complainant has requested ie the specific years when the four legal matters that were settled after proceeding started were settled, and the colleges involved.

Scope of the case

17. The complainant contacted the Commissioner on 17 December 2018 to complain about the way her request for information had been handled. In her complaint the complainant has indicated that she is dissatisfied with UAL's application of section 40(2) to some parts of her request and the timeliness of its response.
18. UAL has relied on section 40(2) with regard to parts a), f) and j) of the request. The Commissioner's investigation has therefore focussed on UAL's application of section 40(2) of the FOIA to these parts. She has also considered whether UAL complied with section 10(1) and section 17(1).

Reasons for decision

19. Section 40(2) of the FOIA says that information is exempt from disclosure if it is the personal data of third persons, ie someone other than the applicant, and a condition under either section 40(3A), 40(3B) or 40(4A) is also satisfied.

20. The first step for the Commissioner is to determine whether the withheld information constitutes personal data as defined by the Data Protection Act 2018 ('DPA').

Is the information personal data?

21. Section 3(2) of the DPA defines personal data as: 'any information relating to an identified or identifiable living individual'.

22. The two main elements of personal data are that the information must relate to a living person and that the person must be identifiable.

23. Information will relate to a person if it is about them, linked to them, has biographical significance for them, is used to inform decisions affecting them or has them as its main focus. The information in this case concerns legal cases that students or ex-students brought against UAL and the Commissioner is satisfied that this information can be said to relate to those individuals.

24. An identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

25. The information UAL has withheld under section 40(2) with regard to part a) is the specific number of legal matters brought by students or ex-students across each year for each individual college. UAL released only one aggregated number - 18.

26. The information UAL has withheld with regard to part f) is the number of legal matters across the eight years that were settled after legal proceedings had started, for each college, and the year of settlement. UAL released an aggregated number - four - and the years between which the matters were settled: 2015 to 2018.

27. Part j) of the request is for information on what, other than monetary sums, were provided by the colleges as part of the settlement, with regard to the matters in f).

28. UAL's initial submission addressed parts f) and j) only and focussed on a separate request the complainant had submitted. UAL did however, provide the Commissioner with the information it is withholding with regard to these parts f) and j). It subsequently provided further submissions to the Commissioner which addressed all three parts and clarified its position with regard to these parts. UAL also provided the information it is withholding with regard to part a).
29. Parts a) and f) of the request are for numbers (the number of legal matters brought against each college and the number settled after legal proceedings started) for each UAL college, for each year from 2011 to 2018. Even though the requested information is numbers, if the number is small enough it may be possible to identify a specific individual or individuals from this number if it combined with the other requested information or with other information in the public domain. UAL has provided the Commissioner with the numbers (and colleges and years) it is withholding with regard to parts a) and the number and years it is withholding with regard to part f). She notes that the numbers are small for each of the relevant years, and colleges with regard to part a).
30. UAL has explained that in its experience of managing legal matters brought against it by students or ex-students, there is usually discussion amongst the student body or the cohort of the course(s) involved. UAL says it therefore cannot release specific details such as the college name, the year of the legal matters – or the details requested at part j). This is because, UAL says, if all this information is put together, it is highly likely that members of the cohort or the wider student body could identify the individuals concerned.
31. In her published guidance on section 40, the Commissioner advises;

When considering identifiability it should be assumed that you are not looking just at the means reasonably likely to be used by the ordinary man in the street, but also the means that are likely to be used by a determined person with a particular reason to want to identify individuals. Examples would include investigative journalists, estranged partners, stalkers, or industrial spies.
32. And the Commissioner has also considered the First Tier Tribunal (Information Rights) decision which considered the suppression of small numbers¹ and the Upper Tribunal decision which upheld the decision

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[http://informationrights.decisions.tribunals.gov.uk/DBFiles/Decision/i1995/Miller,%20Claire%20EA-2016-0265%20\(20.04.17\).pdf](http://informationrights.decisions.tribunals.gov.uk/DBFiles/Decision/i1995/Miller,%20Claire%20EA-2016-0265%20(20.04.17).pdf)

that individuals would not be identified if the small numbers were disclosed (Information Commissioner v Miller – GIA/2444/2017 (EA/2016/0265²)).

33. The Commissioner notes that in the above decisions the age of the data at the time of the request is considered to be a factor to take into account. This is because there may be less risk in people being identified if the data is old. The complainant has requested information from between 2011 and 2018. UAL has provided the Commissioner with the specific years involved for part a) and it has released that the years associated with part f) are between 2015 and 2018. The Commissioner has noted the years but does not intend to detail them here, except to say that with regard to part a) the information goes back to 2011.
34. The FOIA is motive blind and it may well be the case, as she has indicated in her correspondence to the Commissioner, that the complainant is simply undertaking research on UAL settlement payments and has no interest whatsoever in identifying particular individuals. The Commissioner must, however, consider the likelihood of there being anyone else sufficiently motivated to piece together pieces of information – including the withheld information and the information that has been released – in order to identify any particular individual.
35. UAL says that at the time of the request it was not aware of any other information about specific settlement cases being in the public domain. However UAL reiterated that its student body and or the cohort(s) involved do have discussions about legal matters/complaints/disputes that are brought against it and over which it has no control. UAL has also highlighted that there have been media articles in the press about Universities' spend on the settlement of legal matters and therefore this general information is information in the public domain.
36. The Commissioner has undertaken a quick internet search for media articles on legal settlements in the higher education sector. The search retrieved one or two articles on this general topic (ie not concerning UAL specifically) from 2017 and 18 October 2018 (which was before the date

of the request). The issue did therefore have some wider public interest at the time of the request.

37. The Commissioner has also considered the information relating to the years pre-dating 2015. For 2011, for example, it is just about conceivable that a student was in their first year when they brought their legal case and that they were still a UAL student in 2014 or even 2015.
38. Similarly for a case brought in 2012, the student involved could still have been a UAL student in 2014, 2015 or 2016. At the time of the request therefore, there may still have existed some general awareness of, and knowledge about, those students around UAL. The Commissioner is satisfied that, at the point of the request in 2018, the period from 2011 to 2015 was still relatively recent; it could not have been said to have been "the dim and distant past".
39. Given:
 - the small numbers involved
 - the age of the information in question
 - that the matter ie legal settlements against higher education institutions did have some wider public interest at the time of the request, and
 - that an individual in the wider student body, a particular cohort or a UAL staff member may be privy to other information through, for example, general discussion or social media

the Commissioner finds that the withheld information at parts a) and f) falls within the definition of 'personal data' in section 3(2) of the DPA. This is because it may be possible for someone to piece together the withheld information – numbers, years and colleges - with other information in the public domain and so identify one or more individuals. And in the circumstances as they were at the time of the request there may have been individuals with sufficient motivation to do so.

40. The information UAL has withheld under section 40(2) with regard to part j) is information on what, other than monetary sums, were provided by the colleges concerned as part of the settlement in the (four) cases identified at f). UAL has released that the years involved with regard to part f) are between 2015 and 2018. Given that that period is fairly recent relative to the date of the request, and the specificity of the withheld information, the Commissioner is satisfied that, as for parts a) and f), it may be possible for someone to piece together the withheld information with other information in the public domain and so identify one or more individuals. As such the Commissioner finds that the

withheld information at part j) also falls within the definition of 'personal data' in section 3(2) of the DPA.

41. The fact that information constitutes the personal data of identifiable living individuals does not automatically exclude it from disclosure under the FOIA. The second element of the test is to determine whether any of the conditions under sections 40(3A), 40(3B) or 40(4A) have been met.

Is a condition under section 40(3A) satisfied?

42. The condition under section 40(3A)(a) of the FOIA is that disclosure would contravene any of the data protection principles. UAL considers that disclosure would contravene principle (a) under Article 5(1) of the General Data Protection Regulation (GDPR).
43. Article 5(1)(a) of the GDPR states that: "Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject".
44. In the case of a FOIA request, personal data is processed when it is disclosed in response to the request. This means that the information can only be disclosed if to do so would be lawful, fair and transparent. In order to be lawful, one of the lawful bases listed in Article 6(1) of the GDPR must apply to the processing. It must also be generally lawful.
45. UAL's position is that the lawful basis most applicable is GDPR basis 6(1)(f) – legitimate interests. Article 6(1)(f) states that processing shall be lawful only if:

"...processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child".

46. In considering the application of Article 6(1)(f) in the context of a request for information under the FOIA it is necessary to consider the following three-part test:
 - (i) **Legitimate interest test:** Whether a legitimate interest is being pursued in the request for information
 - (ii) **Necessity test:** Whether disclosure of the information is necessary to meet the legitimate interest in question
 - (iii) **Balancing test:** Whether the above interests override the legitimate interest(s) or fundamental rights and freedoms of the data subject.

The Commissioner considers that the test of 'necessity' under stage (ii) must be met before the balancing test under stage (iii) is applied.

(i) Is a legitimate interest being pursued?

47. In considering any legitimate interest(s) in disclosing the requested information under the FOIA, the Commissioner recognises that such interest(s) can include broad general principles of accountability and transparency for their own sakes, as well as case-specific interests.
48. Further, a wide range of interests may be legitimate interests. They can be the requester's own interests or the interests of third parties, and commercial interests as well as wider societal benefits. They may be compelling or trivial, but trivial interests may be more easily overridden in the balancing test.
49. In her complaint to the Commissioner the complainant has said that she is interested in how much UAL is paying out in individual settlements to its students and ex-students. The Commissioner considers that this interest is a legitimate interest for the complainant.
50. In its submission to the Commissioner UAL has acknowledged that there is a legitimate public interest in knowing how public money is spent, the type of legal matters arising in the University and how these matters are addressed.
51. Given the subject matter, disclosure would also have a degree of wider societal legitimate interest, in addition to UAL being seen to be open and transparent more generally.

(ii) Is disclosure necessary to meet the legitimate interests?

52. 'Necessary' means more than desirable but less than indispensable or absolute necessity. Accordingly, the test is one of reasonable necessity and involves consideration of alternative measures which may make disclosure of the requested information unnecessary. Disclosure under the FOIA must therefore be the least intrusive means of achieving the legitimate aim in question.
53. UAL has told the Commissioner that it considers that releasing the further detail requested is not necessary to meet the above legitimate interest. It argues that the legitimate interest has been met through its release of aggregated information. It says that as UAL is the legal entity, providing a breakdown by college provides no additional information on the spending of public funds. UAL considers the matters concerned and the outcomes have already been described in sufficient

detail and that it has been sufficiently transparent by providing the level of detail that it has done in its response to the complainant.

54. As has been detailed above, the complainant has given her interest as being in how much UAL has paid out in individual settlements. While it satisfies a wider public interest in how public funds are spent, releasing aggregated figures does not meet the complainant's specific interest, which is in individual settlements. The Commissioner has therefore gone on to consider the third test; the balancing test.

(iii) Do the above interests override the legitimate interest(s) or fundamental rights and freedoms of the data subject(s)

55. Through this test the Commissioner will balance the legitimate interests in disclosure against the data subjects' interests or fundamental rights and freedoms. In doing so, it is necessary to consider the impact of disclosure. For example, if the data subjects would not reasonably expect that the information would be disclosed to the public under the FOIA in response to the request, or if such disclosure would cause unjustified harm, their interests or rights are likely to override legitimate interests in disclosure.
56. In considering this balancing test, the Commissioner has taken into account the following factors:
- the potential harm or distress that disclosure may cause
 - whether the information is already in the public domain
 - whether the information is already known to some individuals
 - whether the individual expressed concern to the disclosure; and
 - the reasonable expectations of the individual.
57. In the Commissioner's view, a key issue is whether the individuals concerned have a reasonable expectation that their information will not be disclosed. These expectations can be shaped by factors such as an individual's general expectation of privacy, whether the information relates to an employee in their professional role or to them as individuals, and the purpose for which they provided their personal data.
58. In its submission UAL has said that it does not consider that it would be the data subjects' reasonable expectation that details of a legal matter in which they were involved would be disclosed in response to a Freedom of Information request.
59. The Commissioner agrees that the data subjects would have the reasonable expectation that details of their legal claim would not be put into the public domain. Given the nature of this information – which concerns personal matters – the Commissioner considers it likely that

disclosing this information would cause those individuals a degree of damage or distress.

60. The Commissioner has considered all the circumstances of this case. She accepts that the complainant has a legitimate interest in the withheld information. To a degree this has been met through the information UAL has disclosed, as has the wider public interest in UAL being open and transparent in how it uses public funds and how it approaches legal settlements.
61. Having considered all the circumstances, and based on the above factors, the Commissioner has, however, determined that in this case there is insufficient legitimate interest to outweigh the data subjects' fundamental rights and freedoms. The Commissioner therefore considers that there is no Article 6 basis for processing and so the disclosure of the information would not be lawful.
62. Given the above conclusion that disclosure would be unlawful, the Commissioner considers that she does not need to go on to separately consider whether disclosure would be fair or transparent.
63. The Commissioner has decided that UAL was entitled to withhold the specific information requested under section 40(2), by way of regulation 40(3A)(a). And since a condition under section 40(3A) has been satisfied it has not been necessary to consider the conditions under section 40(3B) or 40(4A).

Section 10 – time for compliance / Section 17 – refusal of a request

64. Under section 1(1) of the FOIA anyone who requests information from a public authority is entitled (a) to be told whether the authority holds the information and (b) to have the information communicated to him or her if it is held, and is not exempt information.
65. Under section 10(1) of the FOIA an authority must comply with section 1(1) promptly and within 20 working days following the date of receipt of the request.
66. Under section 17(1) of the FOIA a public authority that is relying on a Part II exemption - such as section 40(2) - to withhold requested information must give the applicant a valid refusal notice within the timescale for complying with section 1(1).
67. In this case, the complainant submitted her request on 26 October 2018 and received a response and refusal notice on 30 November 2018. This was outside of the 20 working day deadline and UAL therefore breached sections 10(1) and 17(1) on this occasion.

Right of appeal

68. 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@justice.gov.uk

Website: www.justice.gov.uk/tribunals/general-regulatory-chamber

69. 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.
70. 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

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

Appendix

"- London College of Fashion -

1. In 2011:

a. How many legal matters were brought against the London College of Fashion this by students or ex-students?

b. How many of these matters were settled prior to legal proceedings?

c. Of the matters settled prior to legal proceedings did the London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?

d. Of the matters settled prior to legal proceedings what were the issues raised as part of the complaint/claim by the student/ex-student?

e. Of the matters settled prior to legal proceedings what monetary sums were paid by UAL/ London College of Fashion as part of the settlement?

f. How many cases issued in were settled after legal proceedings had started and when were they settled?

g. Of the matters settled after legal proceedings started did UAL/London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?

h. Of the matters settled after legal proceedings started what were the issues raised as part of the claim by the student/ex-student?

i. Of the matters settled after legal proceedings started what monetary sums were paid by UAL/London College of Fashion as part of the settlement?

j. Of the matters settled after legal proceedings started what other than monetary sums were provided by UAL/London College of Fashion as part of the settlement?

2. In 2012:

a. How many legal matters were brought against the London College of Fashion this by students or ex-students?

b. How many of these matters were settled prior to legal proceedings?

c. Of the matters settled prior to legal proceedings did the London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?

d. Of the matters settled prior to legal proceedings what were the issues raised as part of the complaint/claim by the student/ex-student?

e. Of the matters settled prior to legal proceedings what monetary sums were paid by UAL/ London College of Fashion as part of the settlement?

f. How many cases issued in were settled after legal proceedings had started and when were they settled?

g. Of the matters settled after legal proceedings started did UAL/London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?

h. Of the matters settled after legal proceedings started what were the issues raised as part of the claim by the student/ex-student?

i. Of the matters settled after legal proceedings started what monetary sums were paid by UAL/London College of Fashion as part of the settlement?

j. Of the matters settled after legal proceedings started what other than monetary sums were provided by UAL/London College of Fashion as part of the settlement?

3. In 2013:

a. How many legal matters were brought against the London College of Fashion this by students or ex-students?

b. How many of these matters were settled prior to legal proceedings?

c. Of the matters settled prior to legal proceedings did the London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?

d. Of the matters settled prior to legal proceedings what were the issues raised as part of the complaint/claim by the student/ex-student?

e. Of the matters settled prior to legal proceedings what monetary sums were paid by UAL/ London College of Fashion as part of the settlement?

f. How many cases issued in were settled after legal proceedings had started and when were they settled?

g. Of the matters settled after legal proceedings started did UAL/London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?

h. Of the matters settled after legal proceedings started what were the issues raised as part of the claim by the student/ex-student?

i. Of the matters settled after legal proceedings started what monetary sums were paid by UAL/London College of Fashion as part of the settlement?

j. Of the matters settled after legal proceedings started what other than monetary sums were provided by UAL/London College of Fashion as part of the settlement?

4. In 2014:

a. How many legal matters were brought against the London College of Fashion this by students or ex-students?

b. How many of these matters were settled prior to legal proceedings?

c. Of the matters settled prior to legal proceedings did the London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?

d. Of the matters settled prior to legal proceedings what were the issues raised as part of the complaint/claim by the student/ex-student?

e. Of the matters settled prior to legal proceedings what monetary sums were paid by UAL/ London College of Fashion as part of the settlement?

f. How many cases issued in were settled after legal proceedings had started and when were they settled?

g. Of the matters settled after legal proceedings started did UAL/London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?

h. Of the matters settled after legal proceedings started what were the issues raised as part of the claim by the student/ex-student?

i. Of the matters settled after legal proceedings started what monetary sums were paid by UAL/London College of Fashion as part of the settlement?

j. Of the matters settled after legal proceedings started what other than monetary sums were provided by UAL/London College of Fashion as part of the settlement?

5. In 2015:

- a. *How many legal matters were brought against the London College of Fashion this by students or ex-students?*
- b. *How many of these matters were settled prior to legal proceedings?*
- c. *Of the matters settled prior to legal proceedings did the London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?*
- d. *Of the matters settled prior to legal proceedings what were the issues raised as part of the complaint/claim by the student/ex-student?*
- e. *Of the matters settled prior to legal proceedings what monetary sums were paid by UAL/ London College of Fashion as part of the settlement?*
- f. *How many cases issued in were settled after legal proceedings had started and when were they settled?*
- g. *Of the matters settled after legal proceedings started did UAL/London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?*
- h. *Of the matters settled after legal proceedings started what were the issues raised as part of the claim by the student/ex-student?*
- i. *Of the matters settled after legal proceedings started what monetary sums were paid by UAL/London College of Fashion as part of the settlement?*
- j. *Of the matters settled after legal proceedings started what other than monetary sums were provided by UAL/London College of Fashion as part of the settlement?*

6. In 2016:

- a. *How many legal matters were brought against the London College of Fashion this by students or ex-students?*
- b. *How many of these matters were settled prior to legal proceedings?*
- c. *Of the matters settled prior to legal proceedings did the London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?*
- d. *Of the matters settled prior to legal proceedings what were the issues raised as part of the complaint/claim by the student/ex-student?*

e. Of the matters settled prior to legal proceedings what monitory sums were paid by UAL/ London College of Fashion as part of the settlement?

f. How many cases issued in were settled after legal proceedings had started and when were they settled?

g. Of the matters settled after legal proceedings started did UAL/London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?

h. Of the matters settled after legal proceedings started what were the issues raised as part of the claim by the student/ex-student?

i. Of the matters settled after legal proceedings started what monitory sums were paid by UAL/London College of Fashion as part of the settlement?

j. Of the matters settled after legal proceedings started what other than monetary sums were provided by UAL/London College of Fashion as part of the settlement?

7. In 2017:

a. How many legal matters were brought against the London College of Fashion this by students or ex-students?

b. How many of these matters were settled prior to legal proceedings?

c. Of the matters settled prior to legal proceedings did the London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?

d. Of the matters settled prior to legal proceedings what were the issues raised as part of the complaint/claim by the student/ex-student?

e. Of the matters settled prior to legal proceedings what monitory sums were paid by UAL/ London College of Fashion as part of the settlement?

f. How many cases issued in were settled after legal proceedings had started and when were they settled?

g. Of the matters settled after legal proceedings started did UAL/London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?

h. Of the matters settled after legal proceedings started what were the issues raised as part of the claim by the student/ex-student?

i. Of the matters settled after legal proceedings started what monitory sums were paid by UAL/London College of Fashion as part of the settlement?

j. Of the matters settled after legal proceedings started what other than monetary sums were provided by UAL/London College of Fashion as part of the settlement?

8. In 2018:

a. How many legal matters were brought against the London College of Fashion this by students or ex-students?

b. How many of these matters were settled prior to legal proceedings?

c. Of the matters settled prior to legal proceedings did the London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?

d. Of the matters settled prior to legal proceedings what were the issues raised as part of the complaint/claim by the student/ex-student?

e. Of the matters settled prior to legal proceedings what monitory sums were paid by UAL/ London College of Fashion as part of the settlement?

f. How many cases issued in were settled after legal proceedings had started and when were they settled?

g. Of the matters settled after legal proceedings started did UAL/London College of Fashion request that the student/ex-student agree to a non-disclosure as part of the settlement?

h. Of the matters settled after legal proceedings started what were the issues raised as part of the claim by the student/ex-student?

i. Of the matters settled after legal proceedings started what monitory sums were paid by UAL/London College of Fashion as part of the settlement?

j. Of the matters settled after legal proceedings started what other than monetary sums were provided by UAL/London College of Fashion as part of the settlement?

- Central Saint Martins -

1. In 2011:

a. How many legal matters were brought against Central Saint Martins this by students or ex-students?

- b. How many of these matters were settled prior to legal proceedings?*
- c. Of the matters settled prior to legal proceedings did the Central Saint Martins request that the student/ex-student agree to a non-disclosure as part of the settlement?*
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- London College of Communication -

1. In 2011:

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- Camberwell College of Arts -

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