

## **Freedom of Information Act 2000 (FOIA)**

### **Decision notice**

**Date:** 7 March 2022

**Public Authority:** The Governing Body of  
Uplands Community College

**Address:** Lower High Street  
Wadhurst  
East Sussex  
TN5 6AZ

#### **Decision (including any steps ordered)**

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1. The complainant has requested from Uplands Community College (UCC) surveys completed by parents and information about incidents. UCC disclosed some information within scope of parts 1 and 3 of the request and withheld information within scope of part 2 and the remainder of the information within scope of part 3. UCC referred to Subject Access Requests and section 40(2) of FOIA in its correspondence with the complainant and that it considered certain information to be other people's personal data.
2. The Commissioner's decision is as follows:
  - On the balance of probabilities, UCC has disclosed all the information it holds that is relevant to the 2019 and 2020 parent surveys and does not hold the raw data for these surveys.
  - With regard to the 2021 survey UCC was entitled to redact some of the information in the 'open question' material it disclosed under section 40(2) of FOIA, as it is other people's personal data, and special category personal data, and it would be unlawful to disclose it.
  - UCC was incorrect to apply section 40(2) to the entire 2021 raw data spreadsheet.

- With regard to part 2 of the request UCC should have relied on section 40(5B)(a)(i) of FOIA to neither confirm nor deny it held the requested information.
3. The Commissioner requires UCC to take the following step to ensure compliance with the legislation:
    - Disclose the information in the following columns of the 2021 parent survey Excel spreadsheet, which have not previously been disclosed or disclosed in that format:
      - Row ID
      - Start time
      - Completion time
      - The columns containing the 'Agree/Disagree/Neither Agree nor Disagree' information
  4. UCC must take this step 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**

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5. On 16 June 2021 the complainant wrote to UCC and requested information in the following terms:
  - 1) Full Copies of all the Parent Surveys from for the last 3 years at UCC by email in zip files / or disk is fine
  - 2) Copies of all the Statements on the assault incident in the week or so prior to our [redacted] being assaulted where [redacted]. Copy of the statement too from the member of staff who witnessed that incident [redacted] and requested the perpetrators name
  - 3) Copies of all the witness statements for those witnesses to the assault on our [redacted] in [redacted], including that of the member of staff who apprehended the perpetrator."
6. UCC responded on 29 June 2021. It advised that it had handled the first part of the request under FOIA. It disclosed UCC's analyses and summaries of parent feedback for the 2019, 2020 and 2021 parent surveys, and the questions that were asked for the 2021 survey.

7. UCC advised that it needed to respond to parts 2 and 3 in accordance with the Data Protection Act (DPA) 2018 and labelled both these parts as a Subject Access Request (SAR).
8. UCC withheld the information falling within scope of part 2 of the request because it "relates to third parties" and the DPA gave it authority to do this.
9. With regard to part 3, UCC disclosed some information having redacted some of it because it "relates to third parties". Finally, UCC indicated that it held other statements but was withholding them because they relate to third parties.
10. The complainant requested an internal review on 29 June 2021. With regard to part 1 of the request, the complainant advised that they wanted full copies of all the parent surveys, which they understood to be anonymous, rather than the summaries that UCC had provided. The complainant advised that UCC had not addressed part 2 of their request at all.
11. With regard to part 3 of the request, the complainant noted that some of the information they have requested was missing but seemed to indicate that names and identity details could be protected, as had been discussed at an earlier meeting.
12. In correspondence dated 1 July 2021, UCC advised the complainant that it did not hold the individual parent survey responses for 2019 and 2020 and explained why it did not. UCC went on to say that: it holds the original responses from parents to the 2021 survey, that in its raw form it would be possible to identify individuals but that it would provide as much of this information as it could. UCC confirmed that it could not release further information within scope of parts 2 and 3 of the request.
13. On 1 July 2021, the complainant again requested "full copies of all parent surveys for the past 3 yrs".
14. On 8 July 2021 UCC sent the complainant two documents relevant to part 1 of the request. It explained that one of the documents related to responses to the closed questions in the 2021 survey and comprised graphs and tables of the relevant data. The second document comprised comments parents had provided in the 'open question' section of the survey. UCC explained that some of the information in the second document constituted personal data. The school advised that public authorities are not obliged to release personal data as it is exempt information under section 40(2) of FOIA. Finally, UCC again confirmed that it does not hold the data for the 2019 and 2020 surveys and confirmed this once more in further correspondence later that day.

15. Nonetheless, in correspondence to UCC dated 11 July 2021 the complainant again advised that they were waiting for "... full copies of all Parent Surveys you received for 2019, 2020 and 2021."
16. UCC wrote to the complainant again on 12 July 2021. It confirmed that it had provided the complainant with all the information that it holds in relation to the three surveys. It advised that the surveys are presented to it as either a series of graphs and tables or the data can be exported into a spreadsheet. UCC said that exporting the data to a spreadsheet, however, would risk identifying those who had completed the survey. UCC also confirmed a final time that it no longer holds any data from the 2019 and 2020 surveys, apart from the analyses that it had provided to the complainant.

### **Scope of the case**

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17. The complainant contacted the Commissioner on 9 July 2021 to complain about the way their request for information had been handled. They dispute that UCC did not hold the 2020 parent survey raw data at the time of their request, and they are dissatisfied that UCC had withheld some of the requested information.
18. From its correspondence to the complainant, UCC appears to have considered that both parts 2 and 3 of the request constituted SARs under the data protection legislation because they were requests "for personal data".
19. In most circumstances a SAR concerns only the personal data of the applicant, not the personal data of other people. As such, SARs are associated with the data protection legislation and not FOIA.
20. However, in part 3 of the request the complainant has exercised their right under section 45 of DPA to request information about an incident and their child, on their child's behalf. Part 3 of the request can therefore be categorised as a SAR and the Commissioner will consider UCC's handling of that part of the request separately.
21. Part 2 of the request concerns statements people made about a separate incident. Neither any statements nor any incident about which statements were made can be categorised as the complainant's own personal data or their child's – any statements and any incident did not concern the complainant or their child themselves, directly. As such, this part is not a SAR and should be considered under FOIA and not the data protection legislation.

22. The Commissioner's investigation has therefore focussed on whether UCC holds further information within scope of part 1 of the request. He will also consider whether redacted information within scope of part 1 is exempt from disclosure under section 40(2). Finally he will consider how UCC has handled part 2 of the request and the application of section 40. As the regulator of the data protection legislation, he will actively apply the correct exemption, if necessary.

## **Reasons for decision**

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### **Section 1 – general right of access to information held by public authorities**

23. Under section 1(1) of FOIA, anyone who requests information from a public authority is entitled under subsection (a) to be told if the authority holds the information and, under subsection (b), to have the information communicated to them if it is held and is not exempt information.
24. Part 1 of the request is for full copies of parent surveys for 2019 – 2021 ie the raw data. UCC advised the complainant that it no longer held the full parent surveys for 2019 and 2020, only the summary information which it had disclosed. The complainant considers that UCC would have held the full 2020 survey information at the point they submitted their request. They are also seeking the 2021 survey raw data behind the graphs and tables disclosed to them.
25. The complainant argues that the 2020 compiled responses/full data was "evidently" used in 2021 to make comparisons against 2021 because parent survey responses/data results claimed improvement percentages. The complainant considers that at the time of the request data sets for both 2020 and 2021 should have been available. This is so that anyone could make a FOIA request in the 2020-2021 school year to satisfy themselves as to the accuracy of the published 2021 results/feedback and claimed improvements against 2020.
26. The Commissioner pointed out to the complainant that FOIA does not require public authorities to keep information in case someone wants to request it in the future. A public authority only needs to keep different types of information, for particular lengths of time, so long as it considers it has a legitimate need for it.
27. However, the Commissioner has considered UCC's correspondence with the complainant and its submission to him. In its response to the request of 29 July 2021, UCC advised that the survey questions are "tweaked" every year and so [the 2021 survey] would not exactly

correlate with 2019 and 2020. UCC said that it edits the Word document each year and does not keep a copy of the questions from the previous years. UCC explained to the complainant how it calculates percentages.

28. Having received clarification from the complainant on 29 June 2021, in correspondence dated 1 July 2021 UCC confirmed to them that, with regard to the 2019 and 2020 parent surveys, it no longer held the individual parent survey responses. UCC advised that it moved to Office 365 in September 2020, and it did not transfer the survey results to Office 365.
29. UCC has confirmed those responses in its submission to the Commissioner. But it has also explained in its submission and a subsequent telephone conversation on 3 March 2022 that the 2019 and 2020 parent surveys were set up by a named member of staff as a form within UCC's Google account. The member of staff only shared the results of the surveys with the Principal via access to the Google account. Neither the Principal nor the staff member downloaded or printed a hard copy of the raw data. The data was never sent by email and was only accessed directly through the Google account. This was the only location in which it was ever held. Due to technical issues, UCC had to delete its Google account in January 2021 and, as a result, no longer has access to it. This has been confirmed with the ICT Manager. The result is that UCC no longer holds any 2019 or 2020 parent survey information other than the two general feedback documents which it has disclosed to the complainant.
30. The Commissioner is satisfied with UCC's explanation which he considers is credible. His decision is therefore that, on the balance of probabilities, UCC has disclosed all the information associated with the 2020 survey [and 2019 survey] that it holds and has complied with section 1(1) of FOIA in that regard.

#### **Section 40 - personal information**

31. The information relevant to any application of section 40 in this case is:
  - 1.1) Certain redacted information within the disclosed 2021 parent survey 'open question' information
  - 1.2) The 2021 parent survey raw data
  - 2) Statement information about an alleged incident

### **Section 40(2) – third person personal data**

32. The Commissioner has first considered the information relating to the 2021 parent survey. UCC has provided the Commissioner with an unredacted copy of the 2021 'open question' information that it disclosed (1.1) and a copy of the survey spreadsheet template (1.2).
33. Section 40(2) of the FOIA provides that information is exempt from disclosure if it is the personal data of an individual other than the requester and where one of the conditions listed in section 40(3A)(3B) or 40(4A) is satisfied.
34. In this case the relevant condition is contained in section 40(3A)(a)<sup>1</sup>. This applies where the disclosure of the information to any member of the public would contravene any of the principles relating to the processing of personal data ('the DP principles'), as set out in Article 5 of the UK General Data Protection Regulation ('UK GDPR').
35. 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'). If it is not personal data, then section 40 of the FOIA cannot apply.
36. Second, and only if the Commissioner is satisfied that the requested information is personal data, he must establish whether disclosure of that data would breach any of the DP principles.

### **Is the information personal data?**

37. Section 3(2) of the DPA defines personal data as:

"any information relating to an identified or identifiable living individual".

38. The two main elements of personal data are that the information must relate to a living person and that the person must be identifiable.
39. 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.

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<sup>1</sup> As amended by Schedule 19 Paragraph 58(3) DPA.

40. 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.
41. With regard to the information redacted from the disclosed 2021 survey information (1.1), the Commissioner is satisfied that, within the closed environment of a school, it would be possible to identify specific individuals from that information together with other information known by staff, students and parents. He is satisfied that the redacted information relates to those individuals. As such, that information can be categorised as other people's personal data.
42. The Commissioner has next considered the 2021 survey raw data, held in a spreadsheet (1.2). As noted, in its correspondence to the complainant of 12 July 2021, UCC had advised that it conducts electronic surveys, and that the results are presented as a series of graphs and tables which it had provided to the complainant. Alternatively, the data could be exported into a spreadsheet. UCC advised that presenting the data in the spreadsheet format risked identifying parents who replied to the survey. Therefore UCC could not release the raw data in a spreadsheet format [because doing this would disclose other people's personal data].
43. The Commissioner asked UCC for more detail on this point and for a copy of the survey spreadsheet template. In the telephone conversation on 3 March 2022, UCC explained that the 2021 survey spreadsheet comprises a series of rows, one row for each parent completing the survey. The spreadsheet's columns record: the row ID, when the survey was started and finished, which year group the child is in – if the parent has multiple children at the school, the different year groups are listed – the child's/sibling's gender (in order of year group), a series of 29 columns that contain statements in the survey against which the parent had to choose 'Agree/Disagree/Neither Agree nor Disagree' and, finally, two columns that contain any comments the parent made in the 'open question' elements of the survey. There are also columns in the spreadsheet headed 'Email' and 'Name'. UCC has confirmed that these two columns are left blank as the surveys are submitted anonymously.
44. UCC considers that if all the raw data was disclosed, it would be possible to identify specific individuals. Key to that identification in UCC's view, is the information on the year group a child and any of their siblings are in and the child's/sibling's gender. UCC considers that it would be possible for certain parents to be identified from this information and, as such, the whole spreadsheet should be withheld.



45. In effect, the complainant has already been provided with much of the information in the spreadsheet. Collated information on year groups, gender and the 'Agree/Disagree/Neither Agree nor Disagree' results have been released in the form of graphs and tables. And as discussed above, UCC has also already disclosed the information in the two 'open question' columns, with some personal data redacted.
46. However, the Commissioner agrees that, in the closed environment of a school and when combined with other information known or in the public domain, including the 'open question' information that has been disclosed, it would be possible to identify specific individuals if certain information in the spreadsheet was disclosed; namely the column that lists each child's/sibling's year group and the column that lists each child/sibling's gender. For example it might be known that a particular parent has two sons in Year 9 and a daughter in Year 11 – it would therefore be possible to identify that parent and their survey responses. With this information therefore, the entire spreadsheet could be categorised as the personal data of third persons; but without those two columns the Commissioner does not consider it would be possible to identify any specific individuals.
47. Once the Year Group and Gender columns are removed, the remaining information would not appear to have any additional value for the complainant because, as noted, the majority of it has already been disclosed. However, the complainant has requested the 2021 raw data and, once the personal data element has been removed from the spreadsheet, it is difficult to see why the remaining information could not be released.
48. UCC considers the entire spreadsheet is personal data that should be withheld under section 40(2). In the Commissioner's view, the spreadsheet can be manipulated so as to remove what he considers is the personal data element; the remaining information is not personal data and could be disclosed.

**Section 40(5) – neither confirm nor deny**

49. The Commissioner has finally considered part 2 of the request which concerns statements.
50. A public authority's duty under section 1(1) of FOIA has been noted above. However, section 40(5B)(a)(i) of FOIA provides that the duty to confirm or deny whether the authority holds the information does not arise if it would contravene any of the principles relating to the processing of personal data set out in Article 5 of the GDPR.

51. In considering whether UCC should have relied on section 40(5B)(a)(i), the Commissioner has also taken account of the special considerations it is necessary to give to protecting children's data under GDPR<sup>2</sup>.
52. For UCC to be entitled to rely on section 40(5B)(a)(i) the following two criteria must be met:
  - confirming or denying whether the requested information is held would constitute the disclosure of a third party's personal data; and
  - providing this confirmation or denial would contravene one of the data protection principles.

**Would confirming or denying that the requested information is held constitute the disclosure of a third party's personal data?**

53. As has been noted, the two main elements of personal data are that the information must relate to a living person and that the person must be identifiable.
54. If UCC were to confirm or deny it held any statements as requested in part 2 of the request it would be indicating whether or not a particular incident took place. Again, within the closed environment of a school and together with information that others associated with UCC may already know, it would be possible to identify those and other individuals from the information, if held, and any incident that occurred would relate to them.
55. The Commissioner therefore considers that confirming or denying whether the information is held constitutes the disclosure of third parties' personal data. If UCC were to confirm or deny it held the information requested in part 2 it would be indicating whether a particular incident took place and would therefore be disclosing to the wider world whether or not particular individuals were involved in any such incident, which is those individuals' personal data.
56. To summarise, with regard to part 1 of the request, and having considered the withheld information, the Commissioner is satisfied that some of the information relates to students, staff and parents associated

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<sup>2</sup> <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/children-and-the-uk-gdpr/>

with UCC. He is satisfied that this information both relates to and identifies the individuals concerned. This information therefore falls within the definition of 'personal data' in section 3(2) of the DPA. With regard to part 2 of the request, the Commissioner is satisfied that confirming or denying that the information is held constitutes the disclosure of personal data.

57. The fact that information/confirmation or denial 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 disclosure/confirmation or denial would contravene any of the DP principles.
58. The most relevant DP principle in this case is principle (a).

**Would disclosure contravene principle (a)?**

59. Article 5(1)(a) of the UK GDPR states that:

"Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject".

60. In the case of an FOIA request, the 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.
61. In order to be lawful, one of the lawful bases listed in Article 6(1) of the UK GDPR must apply to the processing. It must also be generally lawful.
62. In addition, if the requested data is special category data, in order for disclosure to be lawful and compliant with principle (a), it also requires an Article 9 condition for processing.

**Is the information special category data?**

63. Information relating to special category data is given special status in the UK GDPR.
64. Article 9 of the UK GDPR defines 'special category' as being personal data which reveals racial, political, religious or philosophical beliefs, or trade union membership, and the genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
65. With regard to part 1 of the request and the 2021 'open question' survey information that has been disclosed, having viewed the information redacted from that material, and considered UCC's reasoning on this point, the Commissioner finds that some of the

redacted information within the disclosed 'open question' information can be categorised as special category data. He has reached this conclusion on the basis that this particular information concerns students' health and medical and other needs.

66. Special category data is particularly sensitive and therefore warrants special protection. As stated above, it can only be processed, which includes disclosure in response to an information request, if one of the stringent conditions of Article 9 can be met.
67. The Commissioner considers that the only conditions that could be relevant to a disclosure under the FOIA are conditions (a) (explicit consent from the data subject) or (e) (data made manifestly public by the data subject) in Article 9.
68. The Commissioner has seen no evidence or indication that the individuals concerned have specifically consented to this data being disclosed to the world in response to the FOIA request or that they have deliberately made this data public.
69. As none of the conditions required for processing special category data are satisfied there is no legal basis for its disclosure. Processing this special category data would therefore breach principle (a) and so this information is exempt under section 40(2) of the FOIA.

### **Lawful processing: Article 6(1)(f) of the UK GDPR**

70. Article 6(1) of the UK GDPR specifies the requirements for lawful processing by providing that "processing shall be lawful only if and to the extent that at least one of the" lawful bases for processing listed in the Article applies.
71. The Commissioner considers that the lawful basis most applicable is basis 6(1)(f) which states:

"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"<sup>3</sup>.

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<sup>3</sup> Article 6(1) goes on to state that:-

"Point (f) of the first subparagraph shall not apply to processing carried out by public authorities in the performance of their tasks".

72. In considering the application of Article 6(1)(f) of the UK GDPR 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/confirmation or denial 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.
73. The Commissioner considers that the test of 'necessity' under stage (ii) must be met before the balancing test under stage (iii) is applied.

### **Legitimate interests**

74. In considering any legitimate interest(s) in the disclosure of the requested information under FOIA, or confirmation or denial that it is held, the Commissioner recognises that 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. These interest(s) can include broad general principles of accountability and transparency for their own sakes, as well as case-specific interests. However, if the requester is pursuing a purely private concern unrelated to any broader public interest, unrestricted disclosure to the general public is unlikely to be proportionate. They may be

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However, section 40(8) FOIA (as amended by Schedule 19 Paragraph 58(8) DPA and by Schedule 3, Part 2, paragraph 20 the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019) provides that:-

"In determining for the purposes of this section whether the lawfulness principle in Article 5(1)(a) of the UK GDPR would be contravened by the disclosure of information, Article 6(1) of the UK GDPR (lawfulness) is to be read as if the second sub-paragraph (dis-applying the legitimate interests gateway in relation to public authorities) were omitted".

compelling or trivial, but trivial interests may be more easily overridden in the balancing test.

75. In this case the complainant has an interest in incidents that may have occurred at UCC. The complainant also has a concern about how results from the 2019-2021 parent surveys have been analysed and presented. In the Commissioner's view, the complainant's interests are more of a private concern that have limited wider public interest. However, they are nonetheless valid interests for the complainant to have.

### **Is disclosure necessary?**

76. '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 FOIA must therefore be the least intrusive means of achieving the legitimate aim in question.
77. As noted, the complainant has an interest in how the results of the 2021 survey compares with the earlier surveys. The Commissioner has established that UCC does not hold the 2019 and 2020 survey raw data. It holds a 2019 'feedback' document and a 2020 'feedback' document in which these surveys' key findings are noted and discussed, and UCC has released these documents to the complainant. But UCC no longer holds the 2019 or 2020 survey raw data/responses. Even when put together with the remainder of the 2021 spreadsheet, if the elements of the spreadsheet that comprise personal data were disclosed, it would still not be possible for the complainant to compare the 2021 survey with the earlier surveys in the way in which they may want to. As such, the Commissioner does not consider that disclosing the personal data element in the 2021 survey raw data is necessary to meet that interest.
78. The Commissioner also considers that releasing the remaining personal data that has been redacted from the 2021 survey 'open question' information that has been disclosed would not meet the complainant's legitimate interest above, or that discussed below. The majority of that particular information has been released, and, in the Commissioner's view, it is entirely possible to get a broad sense of parents' opinions about UCC from the disclosed information.
79. Finally, the complainant also has an interest in an incident that may have occurred at UCC and appears to want to understand fully what may have happened and how UCC may have managed any such incident.
80. The Commissioner does not consider that it is necessary to confirm or deny it holds the information requested in part 2 of the request to meet

this interest. Confirming or denying any statements are held would, in effect, release other people's personal data into the public domain. In the Commissioner's view this would be an extremely intrusive means of the complainant only partly achieving their aim. The Commissioner appreciates that the complainant may have exhausted some or all of them but, nonetheless, there exist other, more appropriate, routes through which they can pursue with UCC any concern about any incidents. Such routes would not involve disclosing other people's personal data to the wider world, under FOIA.

81. The Commissioner has therefore decided in this case that disclosure/confirmation or denial is not necessary to meet the legitimate interest in disclosure and he has not gone on to conduct the balancing test. As disclosure/confirmation or denial is not necessary, there is no lawful basis for this processing, and it is unlawful. It therefore does not meet the requirements of principle (a).
82. Given the above conclusion that disclosure/confirmation or denial would be unlawful, the Commissioner considers that he does not need to go on to separately consider whether disclosure/confirmation or denial would be fair or transparent.

### **The Commissioner's view**

83. The Commissioner has therefore decided that UCC is entitled to withhold some information within scope of part 1 of the request, that is not special category personal data, under section 40(2) of FOIA as it is nonetheless the personal data of third persons. He has also decided that UCC should have relied on section 40(5B)(a)(i) of FOIA to neither confirm nor deny it holds information within scope of part 2 of the request.

## Right of appeal

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84. 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: 0203 936 8963  
Fax: 0870 739 5836

Email: [grc@justice.gov.uk](mailto:grc@justice.gov.uk)

Website: [www.justice.gov.uk/tribunals/general-regulatory-chamber](http://www.justice.gov.uk/tribunals/general-regulatory-chamber)

85. 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.
86. 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

**Cressida Woodall**  
**Senior Case Officer**  
**Information Commissioner's Office**  
**Wycliffe House**  
**Water Lane**  
**Wilmslow**  
**Cheshire**  
**SK9 5AF**