

## Freedom of Information Act 2000 (FOIA)

### Decision notice

**Date:** 19 March 2024

**Public Authority:** Cabinet Office

**Address:** 70 Whitehall  
London  
SW1A 2AS

#### Decision (including any steps ordered)

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1. The complainant has requested information concerning the Resignation Honours List of Prime Minister Theresa May in 2019, particularly that pertaining to the nomination of Damehood for (then serving) Commissioner of the Metropolitan Police, Cressida Dick.
2. The Cabinet Office initially stated that they did not hold any information within parts 1.2 to 1.6 of the request. They confirmed that they held information within part 1.1 of the request but this was exempt from disclosure under section 37(1)(b) FOIA (the conferring by the Crown of any honour or dignity). At internal review the Cabinet Office confirmed that they did in fact hold relevant information within scope of part 1.4 of the request but that this was exempt from disclosure under section 37(1)(b). The Cabinet Office also revised their previous position in neither confirming nor denying (NCND) whether they held information within parts 1.3, 1.5 and 1.6 of the request.
3. During the course of the Commissioner's investigation the Cabinet Office confirmed that they held three items of information within part 1.2 of the request. One of these items of information was exempt by virtue of section 21 (information accessible to the applicant by other means), one item was exempt from disclosure in its entirety under sections 37(1)(b) and 41(1)(information provided in confidence by a third party), with sections 40(2)(third party personal data) and 23 (information provided by or relating to any of the security bodies) also applying to some of this

information. The Cabinet Office disclosed the third item of information to the complainant, with redactions for information exempt under sections 37(1)(b), 40(2) and 23. The Cabinet Office disclosed to the complainant in its entirety the information within part 1.4 of the request previously withheld under section 37(1)(b) and maintained their NCND position in respect of parts 1.3, 1.5 and 1.6 of the request.

4. The Commissioner's decision is that section 37(1)(b) is engaged to the information held in part 1.1 of the request but that the public interest favours disclosure of most of this information. The Commissioner has found that section 37(1)(b) is engaged to the residual withheld information under part 1.2 of the request and that the public interest favours maintaining the exemption to this information. The Commissioner has found that the Cabinet Office correctly provided a NCND response to parts 1.3, 1.5 and 1.6 of the request and that the public interest favours maintaining section 37(2). The Commissioner has found that in their handling of this request, the Cabinet Office breached sections 1(1), 10(1) and 17(1) FOIA.
5. The Commissioner requires the Cabinet Office to take the following steps to ensure compliance with the legislation.
  - Disclose to the complainant all of the information contained in the document within scope of part 1.1 of the request, with the **exception** of the information specifically highlighted in the Confidential Annex attached to this notice.
6. The Cabinet Office 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

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7. On 12 December 2022, the complainant wrote to the Cabinet Office and requested information in the following terms:

*'1.1. Standard procedures of oversight in the selection of Prime Minister's Resignation Honours List, including procedural processes **and** guidelines or similar on considerations to be conducted in assessing suitability of applicants under this particular scheme.*

*1.2. In selection of candidates for the Prime Minister's Resignation Honours List, procedures and systems that were followed in selection of candidates to be put forward, including input, advice or other from members of government, political party or other.*

- 1.3. In the recommendation to the late Queen of former Commissioner Dick, of any minutes, notes, advisories or other in support of the recommendation of former Commissioner Dick for an award of Damehood being included in the Prime Minister's Resignation Honours List. (Note: by this, I mean discussions, proposals and recommendations in including the former Commissioner on the list during establishment and finalization of the list).*
- 1.4. The recommendation advisory issued to the late queen recommending former Commissioner Dick for an award of Damehood in former Prime Minister Theresa May's Resignation Honours List.*
- 1.5. Considering 'politisation' of Met police, copies of any minutes, notes, communications or other that substantiate its consideration in the process for inclusion for award of Damehood to the former Commissioner by former PM Theresa May.*
- 1.6. A list of all individuals who were included in the process of consideration, recommendation and decision making, including oversight, in including former Commissioner Dick in former Prime Minister Theresa May's Resignation Honours List recommendation to the late Queen Elizabeth'.*
8. The Cabinet Office responded to the request on 12 January 2023 and advised that the information requested was '*partially held*'. By way of background information, the Cabinet Office explained as follows:
- 'The Prime Minister's Resignation Honours were granted by Her Late Majesty the Queen at the request of the Prime Minister on behalf of their predecessor as Prime Minister. The last such list was produced in 2019 following the resignation of the former Prime Minister the Rt Hon Theresa May MP. Resignation Lists provide the former Prime Minister with the opportunity to recognise individuals typically for personal service to them during their administration. The nominations are forwarded to the Honours and Appointments Secretariat within the Cabinet Office to allow the usual propriety checks to be carried out ahead of providing the list to the serving Prime Minister and then The Sovereign. Further information on resignation lists can be found in the London Gazette at: <https://www.thegazette.co.uk/all-notices/content/103419>'.*
9. The Cabinet Office stated that the information requested in part 1.1 of the request was exempt from disclosure under section 37(1)(b) of FOIA, which protects information related to the conferring by the Crown of any honour or dignity.
10. In respect to the required public interest test, the Cabinet Office stated that they had weighed up whether the public interest was better served by the disclosure of the information or withholding it.

11. The Cabinet Office stated that they appreciated the importance of transparency in government that encourages public interest, and the public's awareness of how the honours system works, and the way in which such decisions are taken. However, against these factors the Cabinet Office stated, *'must be weighed the importance of confidentiality, which is essential to protect the integrity of the honours system and without which the system could not function'*.
12. The Cabinet Office noted that the Commissioner's guidance<sup>1</sup> for public authorities provided clear direction that the interpretation of Section 37 includes the policies and procedures that underpin the honours process. The process by which a resignation honours list is created needs to remain confidential in order to maintain the integrity of the system and to ensure that decisions about lists may continue to be taken on the basis of full and honest information and that those who offer opinions may do so freely and honestly, in confidence, on the understanding that their confidence will be honoured. Having considered all the circumstances of the case, the Cabinet Office advised that they had concluded that the public interest *'is better served'* by withholding the information under the exemption.
13. In respect of parts 1.2, 1.3, 1.4, 1.5 and 1.6 of the request, the Cabinet Office stated that they did not hold any information.
14. The complainant requested an internal review on 12 February 2023.
15. With regard to the Cabinet Office's response to part 1.1 of his request, the complainant contended that:  
  
*'Publishing systems and procedures would not put at risk confidentiality of anyone participating in such a process. If there is a requirement to protect an individual's confidentiality then the individual's participation or the input from that individual can be protected without needing to hold secret those systems and procedures to be followed in final decision making of the resignation honours list'*.
16. In support of this contention, the complainant cited the Cabinet Office Fourth Report on the Operation of the Honours System 2015-2019<sup>2</sup>:  
  
*'To broaden the nomination pipeline and to deliver truly representative honours lists, it is essential that people understand the honours system,*

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<sup>1</sup> [Communications with His Majesty and the awarding of honours \(section 37\) | ICO](#)

<sup>2</sup> [Report-on-the-Operation-of-the-Honours-System-Final-for-Publication-1.pdf \(publishing.service.gov.uk\)](#)

*have confidence in its operation, and view it to be accessible. The introduction of public nominations in 1993 and the independent committee system in 2005 were vital reforms in improving transparency and demystifying the processes’.*

17. The complainant contended that understanding of and faith in the systems and procedures of the resignation honours list would be essential to ensure public trust in any honours awarded, knowing there is sufficient oversight, and he questioned how there can be trust without this.

18. The complainant specifically referenced articles from the BBC website which explained how the honours system worked, and contended that these articles<sup>3</sup> illustrated:

*’1) Public interest in the procedures of the honours list to the extent that the BBC and the Home Office found it important to provide a summary detail of it.*

*2) The information has been previously provided to the BBC and by the Home Office because it was in the public interest to disclose it.*

*3) That systems and procedures are already in the public domain, but I require an official version to ensure I am not reliant on unofficial, outdated or incomplete versions and especially if there is a relevant procedure within the Prime Minister’s Resignation Honours that has not been listed’.*

19. The complainant contended that the above published information rendered the refusal by the Cabinet Office *’to provide officially what is already mostly in the public domain’* a disingenuous response that he feared was an attempt to hide information in order to cover up and protect corruption and/or failure in the process of issue of the Prime Minister’s Resignation Honours List to the Queen.

20. The complainant contended that:

*’Transparency and assurance of the highest standard of oversight is facilitated by publishing and making known the processes to be followed in anything which the Monarch gives life to, and that has not gone through the rigors of both houses of parliament. It is surely those same assurances and standards of oversight the public would expect the Monarch would rely on, in granting award and title’.*

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<sup>3</sup> [New-year honours: How does the UK honours system work? - BBC News](#)

21. With regard to the remainder of his request, and the Cabinet Office's statement that they did not hold any information, the complainant addressed each part of his request in turn as below:

Part 1.2

22. The complainant stated that in the event that all systems and procedures laid out and expected to be followed were followed, then he requested that a confirmation be made thereof or if partly followed, then those parts that were not followed be provided or if no process whatsoever in accordance with that laid out was followed, then a statement to that effect be made.
23. He advised the Cabinet Office that:

*'Your statement that the Cabinet Office has no record or information thereof would, at face value, be taken to mean that no process at all was followed. However, it is important for me not to make an assumption and that it be made clear what oversight was followed in the submission to Queen Elizabeth of Theresa May's Prime Minister's Resignation List Awards prompting her signature and grant.'*

Part 1.3

24. For the avoidance of ambiguity and taking into account his comments in respect of part 1.2 of his request, the complainant requested that the Cabinet Office provide confirmation *'that no consideration was made by anyone from the Cabinet Office, other than Prime Minister Boris Johnson (the submitter of the request to Queen Elizabeth and head of the cabinet) into the award of Damehood to then Commissioner Cressida Dick'*. For the sake of clarity, the complainant requested that it be confirmed whether this 'instance' is exclusive to the award made to the then Commissioner Dick or to the entire list of awardees. The complainant requested that in the event that consideration was formally made for anyone on the list, but no record kept, then *'it be made clearly known and there details thereto'*. In the event that consideration was formally made for anyone on the list, a record made, but subsequently destroyed, he asked that *'it be made clearly known, including the reason for its destruction'*.

Part 1.4

25. The complainant advised the Cabinet Office as follows:

*'You have stated that you have no record of an advisory that accompanied Theresa May's Resignation Honours List prompting of Queen Elizabeth to sign the awards and titles to members on the list. It is incumbent on you to advise accordingly where I should request this from should you know of its existence. I therefore request that you do.'*

*For the sake of clarity and avoidance of ambiguity, could you confirm that the Cabinet Office holds no record of the advisory that would have accompanied the request to the queen, of anyone else on the list'.*

#### Part 1.5

26. The complainant noted that this part would be dependent on the outcome of parts 1.2 to 1.4 but due to its implications and impact, he requested that, *'specific statement be made to ensure there is clarity and no ambiguity as to whether anyone in the cabinet office, including that of then Prime Ministers Boris Johnson and Theresa May, is known to have taken the politisation of Met Police into consideration and argument thereof, and whether there is any evidence to that effect'.*

#### Part 1.6

27. The complainant acknowledged that the Cabinet Office had stated that they do not hold information but, *'for the avoidance of assumption or ambiguity, could you confirm that no Cabinet Member undertook oversight in the process of submission of then Prime Minister Theresa May's Resignation Honours List and that such instance extends to the entire list, or whether it is a statement exclusive to then Commissioner Cressida Dick. If they did consider any of, why there is no record thereof'.*
28. For all parts of his request, the complainant asked that in the event that the Cabinet Office do not hold the information, *'because it is held somewhere else, then I ask that its location be advised to me and the contact address I should request it from'.*
29. The Cabinet Office provided the complainant with their internal review on 18 May 2023.
30. The Cabinet Office advised that having considered part 1.2 of the request, they were able *'to release information on the general principles and process for resignation lists'.* The Cabinet Office stated that, *'the nominations are forwarded to the Honours and Appointments Secretariat within the Cabinet Office to allow the usual probity and propriety checks to be carried out ahead of providing the list to the serving Prime Minister and then HM The King'.* The Cabinet Office advised that further information on resignation lists can be found in the London Gazette and provided the complainant with a link<sup>4</sup>.

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<sup>4</sup> [The history of Prime Minister's Resignation Honours | The Gazette](#)

31. Regarding the complainant's specific request in part 1.2, the Cabinet Office confirmed that, *'all due process (as above) was followed for this resignation list'*.
32. In respect of part 1.4 of the request, the Cabinet Office revised their position and confirmed that a further search of their records had confirmed that they did hold information in scope. However, the Cabinet Office advised that this information was exempt from disclosure under section 37(1)(b). The review repeated the public interest test and conclusion which the Cabinet Office had carried out with regard to part 1.1 of the request in their original response.
33. In respect of parts 1.3, 1.5 and 1.6 of the request, the Cabinet Office revised their previous position (stating that no relevant information was held) and instead advised that they could neither confirm nor deny (NCND) whether they held the information requested by virtue of section 37(2) of FOIA. The Cabinet Office stated that this, *'should not be taken as an indication that the information you requested is or is not held by the department'*.
34. The Cabinet Office advised that they had considered the public interest in confirming or denying whether the information requested was held. They recognised that *'there may be a public interest in confirming whether or not the Department holds or does not hold the information you request'* (although the review did not state what this possible public interest could be). However, the Cabinet Office explained that they considered *'that confirming whether or not we hold the requested information would in itself disclose information that would otherwise be exempt under section 37(1)(b), subject to a public interest test'*.
35. The Cabinet Office confirmed that in all the circumstances of the case, they had concluded that the public interest in maintaining the exclusion of the duty to confirm or deny outweighed the public interest in confirming or denying whether they held the information in question.
36. The Cabinet Office informed the complainant that it would be open to him to approach Theresa May's office directly, should he have further questions about the formulation of her resignation honours list and the selection of Ms Dick in particular.

## **Scope of the case**

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37. The complainant contacted the Commissioner on 14 April 2023 to complain about the way their request for information had been handled. At that point in time the complainant was complaining about the Cabinet Office having not provided him with the requested internal review.



38. Following the internal review and in submissions during the Commissioner's investigation, the Cabinet Office revised their position in some respects as regards the parts of the complainant's request.
39. For part 1.1, the Cabinet Office advised that relevant information was publicly available at <https://www.thegazette.co.uk/awards-and-accreditation/content/103419> . They confirmed that they held some information on the standard procedures for a Prime Minister's resignation honours list and this was exempt from disclosure under section 37(1)(b).
40. The Cabinet Office advised that they held three items of information within scope of part 1.2 of the complainant's request.
41. Item 1 was a document confirming the approved honours and the reason for each. Having reviewed this document, the Cabinet Office confirmed that it was already in the public domain at the following link: <https://www.gov.uk/government/publications/resignation-honours-2019> The Cabinet Office stated that they should have identified this document when responding to the complainant's request, and that they would write to the complainant and apologise for not having done so. The Cabinet Office did so on 2 February 2024. They confirmed that section 21 (information accessible to the applicant by other means) applied to this information.
42. Item 2 were records of propriety searches by relevant vetting agencies regarding Cressida Dick, held by the Honours and Appointments Secretariat in the Cabinet Office. The Cabinet Office confirmed that sections 37(1)(b), 40(2)(third party personal data) and 41(1)(information provided by a third party in confidence) applied to the entirety of this report, with section 23 (information provided by or relating to any of the security bodies) applying to some of the information.
43. Item 3 was a submission to the then Prime Minister, Boris Johnson, setting out the procedures and considerations for agreeing a resignation list of honours from a former Prime Minister, with reference to Mrs May's Resignation Honours List. The Cabinet Office advised the Commissioner that an extract of this document, with redactions for information exempt under sections 37(1)(b) and 40(2) had previously been disclosed for a different request. They confirmed that they had therefore reviewed the information in light of the complainant's current request, which was broader in scope, and confirmed that they would disclose this information to the complainant. The Cabinet Office subsequently did so on 2 February 2024.
44. For part 1.4 of the request, the Cabinet Office revised their previous position of withholding information within scope under section 37(1)(b).

The Cabinet Office confirmed that this information comprised the advisory note from Prime Minister Johnson to Queen Elizabeth II and that this document would be disclosed to the complainant. The Cabinet Office provided the complainant with this information on 2 February 2024.

45. In respect of parts 1.3, 1.5 and 1.6 of the complainant's request, the Cabinet Office maintained their revised position at internal review of NCND whether they held any relevant information by virtue of section 37(2) and section 40(5) of FOIA.
46. The Cabinet Office advised the Commissioner that the information held in scope of the request was limited, this being '*predominantly due to the process involved in handling a former Prime Minister's resignation list*'.
47. The Commissioner considers that the scope of his investigation is to determine whether the Cabinet Office correctly applied the stated exemptions to the complainant's request and where the balance of the public interest lies in respect of the same.

## **Reasons for decision**

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### Part 1.1 of the request

48. In submissions to the Commissioner, by way of background and context, the Cabinet Office stated as follows:
49. '*It is a long-standing convention that the outgoing Prime Minister can draw up a 'Dissolution' or 'Resignation' List. This has been the case for many years under past governments from across the political spectrum. The Prime Minister's Resignation Honours are granted by the Monarch at the request of the serving Prime Minister on behalf of their predecessor as Prime Minister.*

*In terms of overall procedural processes:*

- *The outgoing Prime Minister forwards their final resignation list to No.10. This usually includes a list of those nominated for a peerage and a list of names for honours.*
- *No.10 then sends the honours nominations to the Honours and Appointments Secretariat in the Cabinet Office.*
- *Peerages are vetted by the House of Lords Appointments Commission (handled by the House of Lords Appointments Commission Secretariat) before being sent to the Prime Minister. This is a matter of long-standing convention.*

- *The Honours and Appointments Secretariat coordinate probity checks for the honours nominees with a number of government departments (including HMRC) and forward their findings to the Prime Minister for approval before the full list (including peerages) is sent to the Monarch by No.10.*

*The suitability of candidates is a matter for the outgoing Prime Minister and current Prime Minister. The process above was followed for Theresa May's resignation list'.*

### **Section 37(1)(b) – the conferring by the Crown of any honour or dignity**

50. Section 37(1)(b) of FOIA states that information is exempt if it relates to the conferring by the Crown of any honour or dignity.
51. The exemption preserves the integrity and robustness of the honours system in order to ensure that awards are conferred solely on merit. The exemption is also important in protecting the confidentiality of individuals who have participated in the honours process. The wording of the exemption, 'relates to', means that it covers every aspect of the honours process, including the policies and procedures that underpin the process.
52. As part 1.1 of the complainant's request sought standard procedures of oversight in the selection of Prime Minister's Resignation Honours List, including procedural processes and guidelines, the Commissioner is satisfied that the withheld information clearly falls within the scope of the exemption at section 37(1)(b). The information itself does not need to be sensitive or its disclosure prejudicial to any party to engage the exemption, it simply needs to be within the class of information set out in the exemption.
53. However, section 37(1)(b) is a qualified exemption and therefore subject to the public interest test set out in section 2(2)(b) of FOIA. The Commissioner will therefore consider 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 in disclosure**

54. In his request for an internal review of 12 February 2023, the complainant advanced the arguments previously detailed in paragraphs 15-20 of this notice.
55. In submissions to the Commissioner the Cabinet Office recognised that, *'there is a general public interest in disclosure of information relating to the honour conferred on Cressida Dick, given her career as Commissioner of the Metropolitan Police'*. The Cabinet Office stated that

there is a public interest generally in transparency and openness in government and that the public, *'will of course be interested in the reasons and justifications for conferring honours such as that referred to in the complainant's request'*.

56. The Cabinet Office noted that the reasoning for Cressida Dick's honour had been published and the complainant had been provided with a summary explanation regarding the processes involved in resignation lists. They contended that much of the public interest in disclosure of the withheld information is reduced in light of this. The Cabinet Office stated that they fully appreciated the importance of transparency wherever possible and the public interest in understanding the workings of the honours system.

### **Public interest in maintaining the exemption**

57. In submissions to the Commissioner, the Cabinet Office advised that, *'absent any information that might provide evidence to support the complainant's allegations of corruption, we do not see that the public interest would be served by disclosure of information that is largely administrative in nature'*.
58. The Cabinet Office stated that they firmly believed that it is essential to the integrity of the honours system that the means by which nominations are assessed is kept confidential. They noted that, *'it has always been the case that those involved in the system require the freedom to be able to discuss and deliberate individual honours nominations in a safe space. The Commissioner has recognised that for the honours system to operate efficiently and effectively there needs to be a level of confidentiality which allows those involved in the system to do so in a safe space away from external influence'*.
59. The Cabinet Office noted that Parliament had recognised the particular sensitivity of releasing information about honours by expressly providing that the exemption relating to honours information does not expire after 20 years but instead remains applicable for 60 years after the date of its creation<sup>5</sup>.

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

60. In accordance with the test set out in section 2(2)(b) FOIA, the Commissioner has considered whether in all the circumstances of this

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<sup>5</sup> Section 63(3) of FOIA

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

61. The Commissioner notes that in contrast to the other parts of his request, part 1.1 of the complainant's request did not seek any information about the process or procedure which was followed in any **specific/particular** prime ministerial resignation honours list. Rather, this part of the request sought information as to the 'standard' procedures of oversight and guidelines which apply in the selection of prime minister's resignation honours lists.
62. The Commissioner considers that there is a strong public interest in openness and transparency about how prime ministerial resignation honours lists are processed. Having had sight of the withheld information in this case, the Commissioner considers that the information would enhance public understanding of this particular process and the approach taken in relation to the validation of honours nominations.
63. In their original response to part 1.1 of the request, the Cabinet Office stated that:

*'The process by which a resignation honours list is created needs to remain confidential in order to maintain the integrity of the system and to ensure that decisions about lists may continue to be taken on the basis of full and honest information and that those who offer opinions may do so freely and honestly, in confidence, on the understanding that their confidence will be honoured'.*
64. In submissions to the Commissioner, the Cabinet Office stated that, *'the safe space for these important parts of the process must be protected. Disclosure would clearly set a worrying expectation for an area that requires a significantly safe space to properly consider the matters related to conferring honours'*. The Cabinet Office contended that, *'disclosing information regarding issues of propriety would, in our view, inhibit the ability to discuss and deliberate honours cases with freedom and may stop those involved from expressing their views frankly in the future'*.
65. The Commissioner accepts that, in order for the honours system to operate effectively and efficiently, it is important that there is a degree of confidentiality and a safe space for those involved in the process to freely and frankly discuss nominations. The Commissioner also accepts that if views, opinions and commentary about nominations that are provided in confidence, were later disclosed into the public domain, it would be likely to result in individuals in the future being less willing to make similar contributions and/or provide less candid comments and input. The Commissioner considers that disclosure of information that

may adversely impact on this confidentiality, and in turn harm the effectiveness of the honours system, would not be in the public interest.

66. In the circumstances of this case, however, in respect of most of the withheld information pertaining to part 1.1 of the request, the Commissioner considers that the above principles carry little or no weight. The withheld information is concerned solely with the process that is followed in respect of prime ministerial resignation honours lists generally, and does not relate to any specific such resignation honours list. It is clear from the withheld information that the document represents guidance as opposed to strict instructions on how to carry out the validation process for a prime ministerial resignation honours list.
67. In respect of most of the information contained in the document, the Commissioner is not persuaded that its disclosure would encroach upon, or otherwise effect, the safe space required for the consideration of honours nominations, nor breach the confidentiality of anyone involved. The Commissioner does not consider that the disclosure of most of the withheld information in the document would result in any party being less candid or honest in their views or opinions in the future. This is because most of the withheld information does not refer to individuals or any specific honour, nor does it contain any information which has been provided in confidence by any individuals.
68. The above being the case, given the content and nature of the withheld information applicable to this part of the complainant's request, the Commissioner considers that the public interest in disclosure of most of the information outweighs the public interest in maintaining the exemption.
69. In respect of a small amount of information contained in the document, the Commissioner is satisfied that the public interest in maintaining section 37(1)(b) outweighs the public interest in disclosure. As the Commissioner cannot provide further details in this notice without revealing the content of the relevant parts of the withheld information, these details are set out in the Confidential Annex attached to this notice.

#### Part 1.2 of the request

70. In submissions to the Commissioner, the Cabinet Office apologised for the incomplete response provided to the complainant. They advised that they did not hold a single document that describes the processes that were actually followed in this case, but they had identified three documents within scope of this part of the request.
71. The three documents within scope were specifically, a document confirming the approved honours and the reason (citation) for each,

records of propriety searches by relevant vetting agencies regarding Cressida Dick, held by the Honours and Appointments Secretariat in the Cabinet Office, and a submission to the then Prime Minister, Boris Johnson, setting out the procedures and considerations for agreeing a resignation list of honours from a former Prime Minister, with reference to the Resignation Honours List of Mrs May. The Commissioner will address each in turn:

Item 1 – Document confirming the approved honours and the reason for each.

72. Having reviewed this document, the Cabinet Office confirmed that it is in the public domain at the following link: <https://www.gov.uk/government/publications/resignation-honours-2019>. The Cabinet Office wrote to the complainant on 2 February 2024 to apologise for not having picked this up when responding to his request. They confirmed that they should have advised in the original response to the request that section 21 (information accessible to the applicant by other means) applied to this document.
73. As the Cabinet Office have confirmed that this document was publicly available online at the time of the complainant's request, the Commissioner is satisfied that section 21 applies to the same. However, when applying this exemption, a public authority has a duty to confirm or deny whether they hold the respective information, even if they do not intend to disclose it, and to tell the requester where they can find the information. The Commissioner acknowledges that the Cabinet Office have apologised to the complainant for having previously overlooked this document, but it is clearly unsatisfactory that this oversight was not identified at the internal review stage.

Item 2 – Records of propriety searches by relevant vetting agencies regarding Cressida Dick, held by the Honours and Appointments Secretariat in the Cabinet Office.

74. In submissions to the Commissioner, the Cabinet Office advised that sections 37(1)(b), 40(2) and 41(1) applied to the entirety of this information, with section 23 applying to some of the information.
75. As with the information withheld under part 1.1 of the request, the Commissioner will consider whether, in all of the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing Item 2.

### **Public interest in disclosure**

76. As previously noted, in the internal review, under part 1.2 of the request, the Cabinet Office provided the complainant with some information on *'the general principles and processes for resignation lists'*

and confirmed that *'all due process (as above) was followed for this'* (i.e. Prime Minister May's resignation list).

77. In submissions to the Commissioner, the complainant stated that, *'if one is to particularly interpret the 'as above', it would seem to indicate that the checks were carried out by the Appointment Secretariat within the Cabinet Office and did not pass along to independent committees. It is specifically relevant in that it would appear probity was lacking in awarding Geoffrey Boycott a Knighthood even though he was convicted for battery of his girlfriend in 1998 and fined £5100 at that time. His award sparked controversy in the British press'*.
78. The complainant referred the Commissioner to the Seventh Report of the Public Administration Committee into The Honours System (November 2012)<sup>6</sup>, specifically the Committee's comments that:
- 'Subsequent to the publication of our Report we were surprised by the Prime Minister's (David Cameron) decision to bypass the Committee<sup>7</sup> he had so recently established in order to award honours to five ministers who had lost their jobs in the Government's September 2012 reshuffle. Such a move does indeed constitute politicisation of the honours system and flies in the face of the stated position of the Government, as expressed only weeks earlier in oral evidence by Sir Bob Kerslake, the Head of the Civil Service. Without questioning the public service of those selected, by the Prime Minister, to receive honours at the end of their ministerial career, we are concerned that awarding honours in such a manner will further reduce public confidence in the honours system. Again, if the Government supports such political control of the award of honours in certain circumstances, it should be prepared to justify that'*.
79. The complainant explained that he was providing the above references as examples as to why he considered that the 'as above' assurance by the Cabinet Office *'is insufficient and requires greater detail of the procedures, principles, guidelines and standards within the secretariat of how the final list is put forward to the Prime Minister or decision making'*.
80. The complainant also contended that it is in the public interest, *'that there be full transparency and disclosure on all aspects of the award of Damehood through the Prime Ministers Resignation Honours of Theresa May, brought before the Monarch by Boris Johnson'*.

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<sup>6</sup> [Microsoft Word - FINAL further report PASC HC 728 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/microsites/2012/11/microsoft-word-final-further-report-pasc-hc-728)

<sup>7</sup> Parliamentary and Political Service Honours Committee



## **Public interest in maintaining the exemption**

81. In submissions to the Commissioner, the Cabinet Office contended that:

*'Releasing the outputs of the propriety checks provided by third party vetting agencies would undermine the agreements in place for protecting this information. This could jeopardise their ability to provide this information in the future for other nominations and would harm the operation and robustness of the honours system overall'.*

## **The Commissioner's view**

82. As noted above, the Commissioner accepts that, in order for the honours system to operate effectively and efficiently, it is important that there is a degree of confidentiality and a safe space for those involved in the process. The Commissioner considers that the degree of confidentiality attached to information provided by vetting agencies is particularly high.

83. The Commissioner agrees that the disclosure of the outputs of propriety checks provided by third party vetting agencies would undermine the agreements in place for protecting such information. This would have wider adverse impact in that it would, as the Cabinet Office have contended, jeopardise the ability of such agencies to provide this information in the future for other nominations and would consequently harm the operation and robustness of the honours system as a whole.

84. The Commissioner recognises and acknowledges that some decisions taken with regard to honours, such as nominating certain individuals with controversial histories or bypassing an established scrutiny Committee, carry a legitimate and significant public interest in transparency and accountability.

85. However, disclosure of the specific withheld information comprising Item 2 (outputs of propriety checks provided by third party vetting agencies) would not provide any information as to why Cressida Dick came to be nominated for an honour, nor any views or opinions associated with the same. The public interest weight and value of this particular information is therefore very limited, and the Commissioner considers this to be comfortably outweighed by the strong public interest in protecting the operation of the vetting process more generally. The Commissioner considers that the public interest in disclosure is outweighed by the public interest in maintaining section 37(1)(b) to this information.

Item 3 – Submission to then Prime Minister, Boris Johnson, setting out the procedures and considerations for agreeing a resignation list of honours from a former Prime Minister, with reference to the Resignation Honours List of Prime Minister May

86. During the course of the Commissioner's investigation, on 2 February 2024, the Cabinet Office disclosed a copy of this submission to the complainant but withheld (redacted) some of the information contained in the submission under section 37(1)(b), with very small amounts of this information also being exempt under section 40(2) and section 23.

**Section 37(1)(b) – the conferring by the Crown of any honour or dignity**

87. As noted above, section 37(1)(b) of FOIA states that information is exempt if it relates to the conferring by the Crown of any honour or dignity. Having had sight of the withheld information (i.e. redacted parts of the submission to then Prime Minister Johnson), the Commissioner is satisfied that the exemption is engaged to all of the information as the submission clearly relates to Prime Minister May's Resignation Honours List.

**Public interest in disclosure**

88. As noted, the complainant has contended that it is in the public interest that there is full transparency and disclosure on all aspects of the awarding of Damehood to Cressida Dick through Prime Minister May's Resignation Honours List. He advised the Commissioner that, *'the award of Damehood by the Prime Ministers is a material public interest matter and that transparency, candour and disclosure of all aspects of probity, not of her (i.e. Cressida Dick) personally or her merit of it, but of her position in context of the award in the Prime Minister's Honours List, being in the public interest'*.
89. In submissions to the Commissioner the complainant contended that the award to a Commissioner of Met Police is *'substantially different to any award within the honours system and that being issued in a Prime Minister's Resignation Honours List is a direct politicisation of both: The Honours System and of Met Police. Consequently, it violates both'*.
90. The complainant suggested that granting an award to a Commissioner of the Met Police, *'could be perceived as granting of favour which flies in the face of 'policing without fear or favour', or equally, of patronage in which future favour is secured for government officials and, as leader of the Conservative Party, for members and officials of that party'*.
91. The complainant contended that, *'the impact of trust in the honours system may be affected by failure of probity or politicisation of the honours process but would have no major impact on public trust outside of the Honours system in awarding the honours outside of convention, except for the Commissioner of Met Police'*.
92. The complainant advised that he is *'deaf and blind to whoever fills the role and equally, the performance in their role. I would assert that my*

*argument can and should be able to be applied to any past, current or future Commissioner of Policing. The aspect of "merit" in this regard should be irrelevant but that "appropriateness" is relevant'.*

93. Noting that the nature of the Prime Minister's Resignation Honours List is historically political in nature and intended for personal service to the Prime Minister, the complainant contended that this raised a '*material conflict of interest for the Met Commissioner*' (Ms Dick).
94. In his submissions to the Commissioner the complainant drew a comparison with former Prime Minister Johnson's financial arrangements with the former Chairman of the BBC, Richard Sharp, '*which caused a major row over politicisation of the public channel and especially, direct influence of the Prime Minister. The "merit" in the BBC Chairman's performance was not brought into question, but the appropriateness of the transactional relationship with the Prime Minister was*'.
95. The complainant asserted that the damage caused by the awarding of the honour to the now former Commissioner of the Met Police, '*goes beyond just that of public trust in the honours system and policing*'. He submitted that the award could have a far-reaching effect on the Monarchy in that it, amongst other effects, '*placed the Monarch in a position of involvement (or part of) of a process of politicisation of Policing in the UK in which separation of state and policing is considered paramount to public trust*', and, '*opens the door of questioning as to whether the Monarch could or should have used a reserve power to refuse politicisation of Met Police in granting favour to the Commissioner*'.

### **Public interest in maintaining the exemption**

96. In submissions to the Commissioner, and with reference to the submission prepared for then Prime Minister Johnson, the Cabinet Office contended that:
- 'We are strongly of the view that such advice needs to remain confidential in order to maintain the integrity of the system and to ensure that decisions abouts lists may continue to be taken on the basis of full and honest information. Those who offer opinions, however senior they may be, must be able to do so freely and honestly, on the understanding that their advice will remain confidential'*.
97. The Cabinet Office stated that they believed that it is essential to the integrity of the honours system that the means by which nominations are assessed is kept confidential. They noted that, '*it has always been the case that those involved in the system require the freedom to be able to discuss and deliberate individual honours nominations in a safe space. The Commissioner has recognised that for the honours system to operate efficiently and effectively there needs to be a level of*

*confidentiality which allows those involved in the system to do so in a safe space away from external influence’.*

98. The Cabinet Office noted that Parliament had recognised the particular sensitivity of releasing information about honours by expressly providing (under section 63(3) of FOIA) that the exemption relating to honours information does not expire after 20 years but instead remains applicable for 60 years after the date of its creation.
99. The Cabinet Office stated that they considered that there is considerable and significant public interest in protecting the honours system generally and they stated that, *‘to date, despite several requests, there has never been any disclosure under the Act of discussions about whether to award a living person an honour’*. Therefore, at present, the Cabinet Office contended that, *‘those involved in such discussions can have a reasonable expectation that if there were a request for their discussions, the balance of public interest factors would very likely come down in favour of maintaining the exemption’*. The Commissioner would correct at this juncture that in fact the First-tier Tribunal did order disclosure of some information concerning an honour awarded to Vijay Patel, the CEO of Waymade Healthcare, in January 2021 (partially upholding the Commissioner’s decision in FS50830858)<sup>8</sup>. However, the Commissioner acknowledges the Cabinet Office point that such instances of disclosure of honours related information concerning living individuals are exceptionally rare.
100. The Cabinet Office confirmed that they conducted propriety checks and submissions were provided to Prime Minister Johnson concerning Mrs May’s resignation list of honours. They contended that, *‘the safe space for these important parts of the process must be protected. Disclosure would clearly set a worrying expectation for an area that requires a significantly safe space to properly consider the matters related to conferring honours’*. The Cabinet Office contended that disclosing information regarding issues of propriety would *‘inhibit the ability to discuss and deliberate honours cases with freedom and may stop those involved from expressing their views frankly in the future’*.

### **The Commissioner’s view**

101. Cressida Dick’s tenure as Commissioner of the Metropolitan Police between April 2017 and April 2022 coincided with a number of high

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<sup>8</sup> [Cabinet Office v Information Commissioner \(Allowed\) | \[2021\] UKFTT 2019 0093 \(GRC\) | First-tier Tribunal \(General Regulatory Chamber\) | Judgment | Law | CaseMine](#)

profile crises and controversies<sup>9</sup> and the Commissioner recognises and accepts that there is legitimate and significant public interest in any information relating to the honour conferred on Ms Dick by Prime Minister May in her Resignation Honours List.

102. The Commissioner acknowledges and accepts the complainant's observation that prime ministerial resignation honours lists are historically political in nature. For example, the vast majority of the honours nominated in David Cameron's resignation honours list when he resigned as Prime Minister in 2016, were cited as being for '*political and public service*'<sup>10</sup>. However, some honours in such lists are specifically cited for public and not political service. The citation accompanying Cressida Dick's nomination for DBE was '*for public service*'. This was also the case with some other individuals nominated by Mrs May, such as Oliver Robbins, the Prime Minister's Europe Adviser and Chief Negotiator for Exiting the European Union (Mr Robbins' KCMG was for '*public service*'). However, the Commissioner recognises that for a serving Metropolitan Police Commissioner (as Ms Dick then was) to be nominated for an honour by an outgoing Prime Minister, could raise at least the perception of the politicisation concerns contended by the complainant.

103. In this respect the Commissioner notes that Dame Cressida herself warned against the politicisation of policing in her farewell letter to London before her last day in the role of Metropolitan Police Commissioner in April 2022. Dame Cressida wrote that:

*'The current politicisation of policing is a threat not just to policing but to trust in the whole criminal justice system. Operational independence from local and central government is crucial for an effective democracy and is a model respected around the world. We must all treasure and protect it'*<sup>11</sup>.

104. However, as previously noted, the Commissioner accepts that, in order for the honours system to operate effectively and efficiently, it is important that there is a degree of confidentiality and a safe space for those involved in the process to freely and frankly discuss nominations. The Commissioner also accepts that if views, opinions and commentary about nominations that are provided in confidence, were later disclosed

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<sup>9</sup> [Dame Cressida Dick: Crises and controversies of Met chief - BBC News](#)

<sup>10</sup> [Resignation-Honours-2016.pdf \(publishing.service.gov.uk\)](#)

<sup>11</sup> [Cressida Dick criticises 'politicisation of policing' in Met farewell letter | Cressida Dick | The Guardian](#)

into the public domain, it would be likely to result in individuals in the future being less willing to make similar contributions and/or provide less candid comments and input. The Commissioner considers that disclosure of information that may adversely impact on this confidentiality, and in turn harm the effectiveness of the honours system, would not be in the public interest.

105. In this particular case, having had sight of the withheld information (redacted submissions to then Prime Minister Boris Johnson, setting out the procedures and considerations for agreeing his predecessor's resignation honours list), the Commissioner does not consider that disclosure of the withheld information would provide any appreciable additional information or transparency as to the reasons why Mrs May chose to nominate Ms Dick for a DBE (beyond the public citation noted above) or any considerations surrounding the same. Whilst disclosure of the redacted information would clearly provide more transparency as to the process of Mrs May's Resignation Honours List more generally, the Commissioner considers that the public interest in disclosure of this particular information, is comfortably outweighed by the public interest in protecting the confidentiality and effectiveness of the honours system, which would be undermined and damaged by disclosure. In addition, the Commissioner notes that it has been publicly stated that the reason for Ms Dick's nomination was '*for public service*', which meets the attached public interest to some degree.
106. The Commissioner therefore considers that the public interest in disclosure of the residual information withheld (redacted) under section 37(1)(b), is outweighed by the public interest in maintaining the exemption to the same.

#### Part 1.4 of the request

107. With regard to the information held within scope of this part of the complainant's request, the recommendation advisory from Prime Minister Johnson to the Late Queen, the Cabinet Office advised that it seemed that at the time of processing the request, they did not confirm whether No.10 held any information in scope. It was therefore an administrative oversight that they did not press for this.
108. The Cabinet Office advised that when they received the request for an internal review they asked No.10 to confirm whether they held any information within scope. No.10 confirmed that they held one document, the recommendation advisory from then Prime Minister Johnson to HM The Queen.
109. In submissions to the Commissioner the Cabinet Office revised their previous position of withholding the recommendation advisory under section 37(1)(b) and disclosed this information to the complainant.

Parts 1.3, 1.5 and 1.6 of the request

110. As noted, in their internal review, the Cabinet Office revised their original position that they did not hold any relevant information within scope of the above parts of the request and instead advised that they could NCND whether they held the information requested by virtue of section 37(2) of FOIA. The Cabinet Office maintained this position in submissions to the Commissioner and advised that they were also applying section 40(5) to these parts of the request.

**Section 37(2) NCND**

111. In submissions to the Commissioner, the Cabinet Office advised that for them *'to provide a substantive confirmation or denial would be to comment on specific content of information, if held. That would undermine all the work the Honours and Appointments Secretariat does to maintain confidentiality, and might undermine the NCND in similar cases, if there were commentary on this case'*.

112. In relying on the section 37(2) exemption the Cabinet Office confirmed that they had balanced whether the public interest in maintaining the NCND response outweighed the public interest in confirming whether or not they held the information requested. Consequently:

*'The Cabinet Office is of the view that there is no public interest to be served in confirming or denying that information is held in this case. Whilst on the one hand, we agree there is a need for transparency in the honours process, we consider there is a strong case here to neither confirm nor deny that information relating to a named individual is held. We accept that people might be interested in knowing about Cressida Dick's nomination, but for us to confirm whether we hold information in scope would be to reveal information we consider would be exempt under section 37(1)(b). Any information on the matter (if held) would be personal and confidential and would be treated as such. We consider it would be our responsibility to respect the confidentiality that Ms Dick would undoubtedly expect. We note the Commissioner's guidance on NCND is that a public authority need only demonstrate if a substantive confirmation or denial would be prejudicial, not both'.*

113. The Cabinet Office stated that they considered that the public interest in NCND outweighed the public interest in confirming or denying that the information was held. They considered that it was essential that all of those involved in the honours system are given the courtesy of confidentiality for a period of time, and they again noted that section 63(3) of FOIA provides that the exemption relating to honours information does not expire until 60 years after the date of the information's creation.

114. The Cabinet Office emphasised that the public interest inherent in section 37(1)(b) is the protection and preservation of the integrity and robustness of the honours system. Whilst recognising that the exemption was not absolute and advising that the merits of the case had been considered, the Cabinet Office confirmed that in the case of Ms Dick, they considered that the public interest favoured maintaining the NCND position.
115. The Cabinet Office advised that in respect of the public interest, *'our starting point is the desirability for openness in terms of the honours process'*, but that they had to weigh that against the need to protect the confidentiality of individual cases. They confirmed that they had concluded that the public interest favoured maintaining section 37(2) and that they did not consider that confirming or denying whether the requested information was held, *'is necessary for the purposes of informing the public debate, nor does it further anyone's legitimate interests, given the clear expectations of confidentiality in the system'*.
116. In submissions to the Commissioner, the complainant contended that the Cabinet Office had used the NCND provision inappropriately, and that it was in the public interest that, *'there be full disclosure of all processes, minutes and directives in the award to the Commissioner up until it was handed to the Prime Minister. It is already known that the Monarch approved and granted the award at the behest of the Prime Ministers and her constitutional considerations and discussions thereafter would not be of any public benefit to disclose and it does not form part of my request'*.

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

117. The Commissioner will not repeat the public interest arguments surrounding these parts of the request as these have been examined in detail above in respect of part 1.2 of the request above.
118. The Commissioner does not agree with the Cabinet Office assertion that no public interest would be served by confirming or denying whether the specific information requested is held. For example, a confirmation or denial that information was held in respect of part 1.5 of the request would provide some information, and therefore transparency, as to whether any consideration had been given to the politicisation (real or perceived) of the Met Police which the awarding of the honour to a serving Metropolitan Police Commissioner might present.
119. However, the Commissioner recognises and accepts that were the Cabinet Office to provide a confirmation or denial that they held the information requested in parts 1.3, 1.5 and 1.6 of the request, then this confirmation or denial would itself reveal at least some of the content of information, if held. The Commissioner agrees with the Cabinet Office



that such disclosure of information would undermine the work which the Honours and Appointments Secretariat does to maintain confidentiality, and that such an outcome (which would have wider implications and impact than the present case) would not be in the public interest.

120. Consequently, the Commissioner considers that the public interest in providing a confirmation or denial as to whether the Cabinet Office hold the information requested in parts 1.3, 1.5 and 1.6 of the request, is outweighed by the public interest in maintaining a NCND response under section 37(2).

121. Having found that parts 1.3, 1.5 and 1.6 of the request are exempt by virtue of section 37(2), the Commissioner has not gone on to consider the NCND response under section 40(5).

### **Procedural matters**

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122. Section 1(1) of FOIA provides that a public authority must (a) confirm whether it holds information that has been requested and (b) communicate that information to the requester if it is held and is not exempt information.

123. Section 10(1) of FOIA requires a public authority to comply with section 1(1) promptly and within 20 working days following the date of receipt of the request. Section 17(1) requires that a public authority must issue a refusal notice in respect of any exempt information within the same timescale.

124. In this case the complainant submitted his request on 12 December 2022 but the Cabinet Office did not confirm that they held information within parts 1.4 and 1.2 of his request until the internal review of 18 May 2023 and submissions to the Commissioner of 2 November 2023, respectively. The Commissioner has therefore found that the Cabinet Office breached sections 1(1), 10(1) and 17(1) of FOIA.

### **Other matters**

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125. Although internal reviews are not subject to statutory timescales, the Commissioner's guidance to public authorities is clear and well established. He expects public authorities to provide an internal review within 20 working days of one being requested, with a maximum of 40 working days in exceptional cases. In this case the complainant requested an internal review on 12 February 2023, but the Cabinet Office did not provide one until 18 May 2023, more than three months later. This length of time is not satisfactory and the Commissioner

expects the Cabinet Office to provide internal reviews within the parameters of the Commissioner's guidance.

126. Whilst the Commissioner would commend the good quality and detail of the cogent submissions which the Cabinet Office (and the complainant) provided to him in this case, he is concerned that the Cabinet Office's earlier handling of this request was poor and indicative of a lack of proper care and attention being applied to the process.
127. The Cabinet Office originally wrongly stated that they held no relevant information within parts 1.2 to 1.6 of the complainant's request (it later transpiring that they did in fact hold information within scope of parts 1.2 and 1.4 of the request).
128. At the internal review stage, a further search advised that they held information in scope of part 1.4 of the request, but that this information was exempt under section 37(1)(b). The review provided information on the general principles and process for prime minister resignation honours lists, but failed to identify that part 1.2 of the request concerned the specific Resignation Honours List of Prime Minister May. In respect of parts 1.3, 1.5 and 1.6 of the request, the Cabinet Office revised their original position that they did not hold the information requested to NCND whether they held this information.
129. During the Commissioner's investigation, the Cabinet Office advised that they had subsequently identified some information within scope of part 1.1 of the request but withheld this information in its entirety. The Commissioner has ordered disclosure of most of this information. The Cabinet Office confirmed that they held three items of information within scope of part 1.2 of the request (not previously identified) and that one of these items was already in the public domain (section 21 applying). The Cabinet Office belatedly disclosed a redacted copy of one of these items (submissions to Prime Minister Johnson) to the complainant. The Cabinet Office also belatedly disclosed to the complainant the information (advisory note from Prime Minister Johnson to Queen Elizabeth II) in part 1.4 of the request previously withheld under section 37(1)(b).
130. In submissions to the Commissioner, the Cabinet Office explained that when they originally processed the request they did not confirm whether No.10 held any information in scope due to an administrative oversight. The failure to make enquiries/checks with No.10 is itself a concern and does not explain why the Cabinet Office withheld the advisory note in full at the internal review stage and only later disclosed it to the complainant during the Commissioner's investigation.
131. The inconsistent and erroneous handling by the Cabinet Office of this request, which was set out very clearly and precisely by the

complainant, can have done little to instil confidence in the request handling process. Had the complainant not brought this matter to the Commissioner's attention, the actual position as regards the extent of relevant recorded information held by the Cabinet Office would not have been ascertained, and the complainant would have been denied access to non-exempt information. That is concerning and very unsatisfactory.

132. The Commissioner hopes that the outcome of his investigation will be of some assurance to the complainant and he will expect the Cabinet Office to learn lessons from this case and bring a tighter focus and more careful attention to the processing of such requests in future.

## **Right of appeal**

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133. 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)

134. 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.

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

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