

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 28 May 2012

Public Authority: Blagdon Parish Council
Address: Waterdene
High Street
Blagdon
Bristol
BS40 7TQ

Decision (including any steps ordered)

1. The complainant requested financial information from Blagdon Parish Council ("the council"). The council provided some information and said that other information was already available, not available or had been withheld because it was exempt personal information in accordance with section 40(2). In a follow up request, the complainant expressed dissatisfaction with the response provided and made further requests. The council said that this further correspondence was vexatious in accordance with section 14(1) of the Freedom of Information Act 2000 ("the FOIA"). The Commissioner's decision is that the council correctly relied on section 40(2) and 14(1). However, in relation to the first request, the Commissioner found that the council had failed to identify some relevant information and had incorrectly withheld some information.
2. The Commissioner requires the public authority to take the following steps to ensure compliance with the legislation.
 - Disclose to the complainant the information provided to the council's external auditor headed "Explanation of variances – proforma"
 - Disclose to the complainant the breakdown that was prepared in October 2010 apart from the information in this document showing financial figures relating to the clerk's pension
3. The public authority must take these steps within 35 calendar days of the date of this decision notice. Failure to comply may result in the

Commissioner making written certification of this fact to the High Court (or the Court of Session in Scotland) pursuant to section 54 of the Act and may be dealt with as a contempt of court.

Request and response

4. On 1 July 2011, the complainant requested information from the council in the following terms:

"Please now supply me with the detailed Income and Expenditure statement or similar document which I presume as a quality parish council you must be producing. If no such statement is produced please let me know.

If there is no such statement please provide me with lead schedules showing the make up of every figure on the annual return.

I would also like to be provided with copies of the detailed budget for the year ended 31st March 2011 together with your analysis of any key variances between the budget and the actual figures for that year.

Please also supply me with the budget for the year ending 31st March 2012".

5. The council replied on 31 July 2011. The council provided some information and said that other information was already available, not available, had been withheld because it was exempt personal information.
6. The complainant replied on 10 August 2011 and expressed dissatisfaction with the response. He requested further information, the terms of which have been set out below. For clarity, the request asking for a breakdown of the time spent below refers to comments made by the council in its response of 31 July 2011 suggesting that it was aggregating the cost of responding to requests from the complainant.

"They are however very interesting as they indicate the speed at which you work and thus the value for money you provide to our village. Given that all the information you supplied to me would have been within your possession, I find it thoroughly revealing to discover that it appears to have taken you in the order of 9 to 10 hours to prepare.

Please provide a breakdown of your time to provide the answers to each numbered point in your reply.

Turning to other matters please let me know the clerks gross salary. The

net salary to which you refer is utterly meaningless as the gross figure is the true cost...

It leads me to wonder whether the clerk lacks the accounting knowledge to produce these tools and perhaps you could let me know what accounting and budgeting training and/or qualifications the clerk has".

7. The council responded on 22 August 2011. It said that it was not going to respond as it considered that the correspondence was vexatious under section 14(1) of the Freedom of Information Act 2000 ("the FOIA").
8. On 4 September 2011, the complainant wrote to express dissatisfaction with the refusal.
9. The council said that it wished to maintain its position in an internal review that was conducted on 12 October 2011.

Scope of the case

10. In relation to the requests that were made on 1 July 2011, the complainant said that he wished the Commissioner to consider the following issues:
 - Whether the council held more information falling within the scope of his request that it had failed to make available
 - Whether the council had incorrectly withheld some information.
11. The complainant also asked the Commissioner to consider whether the council correctly refused to respond to his further correspondence on 10 August 2011 using section 14(1)

Reasons for decision

The withheld information

12. In its response to the complainant's first request, the council made the following comment:

"7. Key variances

You ask for details of the key variances between the budget and actual figures for that year but this is an information exchange between accountants and Councils and not for publication. If you have a specific question on specific figures you can write with the details".

13. The Commissioner explained to the council that the above did not represent a valid response in accordance with the legislation. The Commissioner made it clear to the council that if it wished to withhold this information it would need to issue a proper refusal notice under section 17 of the FOIA, citing a valid exemption and full rationale. The Commissioner directed the council to the significant amount of guidance available on his website about refusing requests for information. In response the council said the following:

"In not providing this information to [the complainant] we acted on advice from Mazars [the council's external auditor]...who advised that it was between the Accountants and the Council alone".

14. As the council failed, despite the Commissioner's guidance, to adequately justify the legal basis on which it is refusing to disclose this information under the FOIA, the Commissioner has ordered the disclosure of this information.

Section 40(2) – Third party personal data

15. This exemption provides that third party personal data is exempt if its disclosure would contravene any of the Data Protection Principles set out in Schedule 1 of the Data Protection Act 1998 ("the DPA").

Is the withheld information personal data?

16. The council told the Commissioner that it was seeking to withhold the clerk's net salary and financial details of his pension. Personal data is defined by the DPA as any information relating to a living and identifiable individual. The clerk's net salary and pension details are clearly personal data.

Would disclosure breach the Data Protection Principles?

17. The Data Protection principles are set out in Schedule 1 of the DPA. The first principle and the most relevant in this case states that personal data should only be disclosed in fair and lawful circumstances. The Commissioner's considerations below have focused on the issue of fairness. In considering fairness, the Commissioner finds it useful to balance the reasonable expectations of the individual and the potential consequences of the disclosure against the legitimate public interest in disclosing the information.

Reasonable expectations

18. The council argued that disclosure of the net salary would not have been within the reasonable expectations of the clerk because the gross salary is already publicly available. The council also commented that the clerk's

position was not senior and therefore this level of transparency would not be commensurate with the role.

19. In relation to the pension details, the council highlighted that this information is typically kept private and there would not have been any reasonable expectation regarding the disclosure of this information.

Consequences of disclosure

20. The council argued that disclosure of the pension details would be distressing because it would be outside any reasonable expectation that the clerk would have had.
21. In relation to the net salary, the council argued that this could allow the public to estimate other information relating to the clerk's salary, such as current tax code or changes in the clerk's performance rating (since the council operates a performance related pay contract).

Balancing the rights and freedoms of the data subject with the legitimate interests in disclosure

22. The Commissioner has published guidance on the subject of salary disclosures. For ease of reference, that guidance can be accessed here:
http://www.ico.gov.uk/for_organisations/guidance_index/~/_media/documents/library/Freedom_of_Information/Practical_application/SALARY_DISCLOSURE.ashx
23. The guidance makes clear that disclosure of an individual's exact salary will only be justified in exceptional circumstances. The Commissioner did not consider that there were any such circumstances in this case. There is a legitimate public interest in a certain amount of transparency concerning public sector salaries however the Commissioner considers that the council has already satisfied this by disclosing the gross salary. Disclosure of the net salary would be disproportionate and beyond any reasonable expectation that the clerk is likely to have had, in view of the nature of that position. The Commissioner also agreed with the council that pension details are typically private and disclosure of this type of information would be unwarranted in this case. The Commissioner was satisfied that disclosure could have been distressing.

Requests made on 1 July 2011 – Was more information held?

24. Section 1 of the FOIA states that any person making a request for information to a public authority is entitled to be informed in writing by the public authority whether it holds information of the description specified in the request, and if that is the case, to have that information communicated to him.

25. In cases where a dispute arises over the extent of the recorded information that was held by a public authority at the time of a request, the Commissioner will consider the complainant's evidence and argument. He will also consider the actions taken by the authority to check that the information was not held and he will consider if the authority is able to explain why the information was not held. For clarity, the Commissioner is not expected to prove categorically whether the information was held. He is only required to make a judgement on whether the information was held "on the balance of probabilities".¹
26. The complainant explained to the Commissioner that he considered that the council held more detailed information falling within the scope of his request than it had made available. He said the council had made comments in meetings that suggested to him that more detailed information was available.
27. When initially questioned about the matter by the Commissioner, the council maintained that no further information was held apart from the withheld information identified above. Upon further questioning, the council identified that it had located more relevant information, which the council described as a "breakdown" that was prepared, but not used, in October 2010. The council explained that when it received the request, the clerk had initially made searches of his electronic records for relevant information. However, during the Commissioner's investigation, the council had also questioned councillors involved in the council's financial planning process to check whether any relevant information is still held. The council did not indicate to the Commissioner that there was any valid reason for not providing this document to the complainant and the Commissioner has therefore ordered its disclosure in this notice, with the exception of financial information about the clerk's pension.
28. The council maintained that there is no more relevant information held. The council said that it is aware that the complainant is a practising accountant and as a result, it considers that his expectations of what should be held are much greater than the actual reality. The council said that it keeps records that are in accordance with its legal obligations. As a small parish council, internal and external audit only requires no more than accounts prepared on a receipt and return basis. This is simply a summary of what is paid out and what is received together with the closing figure at the bank. The council said that for transparency, on each agenda and minutes, the council details every item of money

¹ This approach is supported by the Information Tribunal's findings in *Linda Bromley and Others / Environment Agency* (31 August 2007) EA/2006/0072

received save bank interest. The council said that this information has been made available to the public since 2007 on the council's website and the complainant is fully aware of that fact. The council said that no breakdown of expenditure is required and only a verbal explanation is required if appropriate when there is a significant overspend. The council said that it had also provided the bank interest, details of assets and an explanation of its budget to the complainant.

29. The council told the Commissioner that no relevant information had been deleted, destroyed or mislaid.
30. Based on the above, the Commissioner was satisfied that with the exception of the one additional item identified, no further relevant information was held.

Requests dated 10 August 2011 – section 14(1)

31. Section 1(1) provides a general right of access to recorded information that is held by public authorities. Section 14(1) of the FOIA states the following:

"Section 1(1) does not oblige a public authority to comply with a request for information if the request is vexatious".

32. Guidance on vexatious requests is available on the Commissioner's website at www.ico.gov.uk and for ease of reference, at the following links: http://www.ico.gov.uk/for_organisations/freedom_of_information/information_request/reasons_to_refuse.aspx

<http://www.ico.gov.uk/foikb/SectionsRegulations/FOIPolicySection14.htm>

33. As explained in the guidance, when considering if a request for information is vexatious, the Commissioner will consider the argument and evidence that the complainant and the public authority are able to provide. The Commissioner's analysis will generally focus on the following questions:

- Could the request fairly be seen as obsessive?
- Is the request harassing the authority or causing distress to staff?
- Would complying with the request impose a significant burden in terms of expense and distraction?
- Is the request designed to cause disruption or annoyance?
- Does the request lack any serious purpose or value?

34. It will not be necessary for all of the above criteria to apply but in general, the more that apply, the stronger the case for a vexatious request will be. The Commissioner is able to take into account the history and context of the request.
35. The council provided the Commissioner with a bundle of evidence, mainly comprising of copies of correspondence between itself and the complainant. For clarity, the Commissioner has disregarded any items that date more than 20 working days after receipt of the request of 10 August 2011. That correspondence cannot be relevant to the decision on the use of section 14(1).

Could the request fairly be seen as obsessive?

36. When a request for information is refused as vexatious, it is often the case that an examination of the background will reveal a long and difficult relationship between the parties that has arisen as a result of an original dispute. This is clearly the case here.
37. The council said that its correspondence with the complainant began in April 2010 and those communications related to the cutting of some brambles from a roadside grass verge some way from the complainant's address. The council told the Commissioner that the complainant had claimed family ownership of the land but the Land Registry had confirmed that the small piece of land is unregistered. The council provided to the Commissioner copies of a series of communications sent by the complainant, demanding an apology because a councillor had cut brambles without permission. The council said that prior to this dispute it had never received a request under the FOIA. The complainant's correspondence indicates that as a result of his dissatisfaction with the handling of this particular matter, the complainant began pursuing concerns regarding, as the complainant says in a letter dated 4 May 2010,

"...decisions of the parish council that do not provide best value to the village and/or have further the wishes of individual councillors without due regard for what would be the best for the village as a whole".

38. This original dispute generated requests for information that were much wider in scope, connected to the council's processes and procedures. Evidence was provided to the Commissioner demonstrating that receipt of information generated further complaints and questions about that information, including criticism of the council and the clerk. In its internal review, the council commented that many of the items of correspondence appear to be "fishing" for any possible route to criticise the council, each raising further tangential issues. It said:

"As a one off your requests might not be considered unreasonable but the sheer weight and number of them, many appearing to move from one issue to another with each item only left when you have picked the bones clean of any possible criticism you can make of the Council, make them unreasonable".

39. The council's refusal notice on 22 August 2011 sets out the council's view that over the last 18 months or so, the complainant has conducted a "campaign" against the clerk and to an extent, the council and councillors, both publicly and in correspondence. The council pointed towards the sheer volume of correspondence that it had received from the complainant over the relevant time period and it expressed the view that expecting the council to engage in this manner was unreasonable. The council said that no member of the public in any serving councillor's memory has ever persisted in correspondence over such a period at this level of intensity. The council said that very few of the items of correspondence are limited to just one page and many contain multiple questions and requests.
40. It is clear that the complainant also attended parish council meetings to raise various concerns. There are differing accounts of the complainant's behaviour at those meetings however, one fact appears not to be disputed by either party and that is that one meeting was closed because the complainant refused to leave when requested to do so. It is also clear that the complainant's criticism of the council and the clerk has had a very public dimension.
41. The council said that it had attempted to respond to a variety of requests and concerns raised by the complainant since April 2010 relating to the council's finances and its procedures. As already mentioned in this notice, the council explained to the Commissioner that it appeared that because the complainant is a practising accountant, his expectations of a parish council's accounting systems are immeasurably greater than legislation requires.
42. The council also argued that the complainant often "overlooks" the answers it has already provided which results in the same issues being revisited or the council's position being misrepresented in public.
43. The council said that when it received the requests made on 10 August 2011, it decided that it was apparent that whatever response the council provided, it was only likely to generate further communications along the same lines, criticising the council's processes and generating further complaints, requests and questions. The council pointed to its previous experiences of dealing with the requester as evidence to support this was likely to be the case. The scale of the complainant's desire is made clear at the end of one letter when he says:

"What do I want now?"

A root and branch internal investigation into the workings of this Council with the aim of producing a quick and incisive report, bringing forth recommendations for a complete overhaul of the chain of command and lines of communication".

44. The council drew the Commissioner's attention to the fact that in relation to two of the requests being pursued (the clerk's gross salary and qualifications) this information was already readily accessible to the requester. It pointed out that the requester had been provided with details of the clerk's qualifications on 21 May 2010 in response to a previous request and details of the clerk's gross salary had been published in council minutes in November 2009. The council said that the information had not changed since that date. The council's position is that requesting information that is already readily accessible is evidence of the complainant's continuing unconstructive campaign against the council and betrays an obsessive focus on criticising the clerk.
45. In relation to the request asking for a breakdown of the clerk's time to respond to the previous request, the council said that the council decided to implement a charging policy in view of the complainant's continuing demands on the council's resources. The council said that the advice it gave at that stage in the process was intended to be constructive and helpful. It said that the council had not issued any refusal under section 12(1) at that stage and in those circumstances, pursuing that information was not productive and formed part of the complainant's continued efforts to access information that he can use to undermine the council's position and criticise the clerk in particular. This is demonstrated by the context of that particular request which infers that the clerk is not providing a "value for money" service, as well as its distracting timing, immediately following another request for information.
46. The complainant told the Commissioner that the reason further items of correspondence are often generated is because of the clerk's failure to provide an adequate response. The complainant said that the clerk "creates work" and makes "mountains out of molehills". The complainant expressed the view that it would not be fair to blame him for the failures of the clerk. He accepts that he has been persistent and on occasion has expressed himself in strong terms however he does not accept that this means his requests were obsessive. The complainant says that his persistence has been necessary and not unduly repetitious.
47. The complainant added that he has lived in the village for a long time and it is only in recent times that he has had cause to be critical of the parish council. The complainant said that he considers that he has the

support of some other parishioners in being "dismayed" by the way the council carries out its business. The complainant said that he finds the council to be generally unhelpful and secretive. He says that he considers that the council has deliberately tried to intimidate him on some occasions.

48. The complainant has alleged that the council has a distorted view of his motives and is prone to "cherry-picking" the aspects that suit its argument best while not fully representing his position. The complainant also expressed the view that as a parishioner, it is his right to request information that enables him to judge the performance of the council. He said that he considered that it was appropriate for him to make the requests as he was considering standing for election as a councillor and his background in accountancy meant that he considered he could add value to this area of the council's work. He disputes that the requests he is making now are connected to the original dispute over the cutting of brambles, although he accepts that was the start of his interest in the council's business.
49. The Commissioner carefully considered the detailed arguments presented by both parties. On the balance of probabilities, the Commissioner decided that the council had provided sufficient evidence to demonstrate that the requests made on 10 August 2011 were obsessive.
50. Having considered the correspondence presented, the Commissioner considers that it is clear that the complainant's original dissatisfaction with the way the council handled his complaint about cutting the brambles has impacted significantly and disproportionately on the manner in which he has engaged with the council since that time and it is disingenuous in the Commissioner's view to suggest that it has not. The complainant said in one item of correspondence that his wide-ranging requests had become necessary because of the council's decision to "avoid responsibility" for the bramble cutting.
51. The Commissioner accepts the point of view expressed by the complainant that it is legitimate to make enquiries of the council and judgements about the service it is offering to a point. However, the issue in this case is not whether that is a legitimate activity but whether the extent to which this has been done, as well as the manner in which it has been done, has gone beyond what could be characterised as fair, proportionate and objective enquiries. The Commissioner agrees with the council on this occasion that the sheer volume and complexity of the communications, coupled with constant criticisms of the council's business, betrays an obsessive approach to disclosure and damaging the reputation of the council and the clerk which is clearly rooted in the

complainant's dissatisfaction with the way his complaint about the brambles was handled.

52. The Commissioner considers that it was reasonable for the council to perceive that whatever response it provided was likely to generate further criticisms, requests and questions. The Commissioner considers that the complainant's allegations that the council has been unduly secretive, unhelpful and deliberately intimidating are unconvincing based on the evidence. The Commissioner accepts that it is likely that the council will have fallen short in its responsibilities under the legislation on some occasions. Indeed, this notice itself makes apparent that the council needs to improve and develop its awareness of FOIA (see comments in the Other Matters section of this notice). However, the Commissioner considers that this needs to be seen in its appropriate context, that being a small parish council with a clerk dealing with particularly challenging behaviour from the complainant. Overall, the Commissioner was left with the impression that the council had worked hard, in the above context, to make information available to the complainant and answer his constant questions and criticisms.

Did the request have the effect of harassing the council?

53. The Commissioner would like to highlight that this element of the criteria is concerned with the effect of the request on any reasonable public authority, rather than what the complainant's intention was. It is not uncommon in relation to vexatious requests for the requester to have a genuine conviction that the request was a reasonable one, as in this case.
54. The Commissioner would like to highlight that there is often a significant overlap between elements of his criteria. The arguments presented above are also relevant to the question of whether the request had the effect of harassing the council and has been taken into account.
55. The council told the Commissioner that it considered that the correspondence of 10 August 2011 represented further abuse of the clerk and that the ongoing nature of the correspondence had been stressful. The council said that prior to the request in issue, it had written to the complainant to express its concerns and comment that it found the behaviour regarding the clerk in particular to be unacceptable. The council provided the Commissioner with a copy of a letter addressed to the complainant which contained the following comments:

"...There are aspects of your letter that the council and I deem to be abusive. Therefore, where any future correspondence is received that could be deemed abusive, either in whole or in part, no response will be

given. I will provide details to the Council which, as an employer, has obligations to its employees over dealing with letters of this nature".

56. The Commissioner notes that the council's expression of concern did not appear to have any significant impact on the complainant's behaviour. He rejected the conclusion that any of his correspondence could be deemed to be abusive and he expresses concern that the clerk has taken "matters to heart" when they were not intended to be personal. The complainant goes on to request the guidelines used when deciding whether correspondence is abusive and an elaboration on precisely what elements of past correspondence are deemed to be abusive.
57. The Commissioner noted that the complainant questioned the competency of the clerk on a number of occasions and evidence shows that he also made allegations about the clerk at council meetings. Indeed, the request that is in issue in this case itself makes criticisms of the clerk. It was clear to the Commissioner that the clerk perceived that the complainant was consistently impugning his character and abilities and the added public dimension to this criticism had the effect of increasing the harassing effect. The complainant also made direct reference in one item of correspondence to having had a number of conversations with residents of the village where the conclusion, according to the complainant, was that "you will get nowhere with that lot" and the subject of the clerk frequently arose. Concern was sufficiently great for the council to consider pursuing legal action against the complainant although in the event, the council decided against this course of action.
58. The Commissioner noted various examples of haranguing and provocative language, where the complainant questions the intelligence, competence and motives of the clerk on multiple occasions:

"What other work you have that is pressing is again an irrelevancy and I'm afraid that it is hard to escape the belief that you are the cause of much of it in the first place" (Email dated 4 May 2010).

"It is not your response, as such, that I was querying as I am sure you well know. Rather it is your apparent predilection to misinterpret either through carelessness or a more sinister desire to misinterpret that is the issue even if you think that can be masked as an attempt at being helpful". (Email dated 4 May 2010).

"Oh indeed, I am now well aware of your personal style, unfortunate as it is. Only too willing to be 'helpful' when you feel it suits you yet quickly uncommunicative when the heat in the kitchen gets a little too much for you" (Email dated 4 May 2010).

"I am unsure whether you are being deliberately obtuse or do not have the capacity to comprehend the issue here" (Email dated 25 May 2010).

"Yet again, you fail to understand my point and I am at a loss to know whether this is a result of you being deliberately obtuse, or lacking the ability to comprehend a relatively straight-forward concept. Both concern me greatly and I hope we shall get to the bottom of it eventually" (letter dated 13 July 2010).

59. As already highlighted above, the complainant does not accept that his correspondence has been harassing, although he accepts that he has expressed himself in strong terms. Overall, the complainant's point of view appears to be that his behaviour was justified by the failures of the clerk to do his job properly. As described already in this notice, the Commissioner finds this argument to be unconvincing based on the evidence. It is clear to the Commissioner that the complainant pursued his personal grievance against the council, and the clerk in particular, to inappropriate lengths.

Would the request impose a significant burden?

60. The council told the Commissioner that the clerk had been far exceeding his statutory hours of work in dealing with issues raised by the complainant and this has resulted in the council incurring additional expense for the extra resource. The council also highlighted the sheer volume of correspondence over the relevant period, as well as its complexity. Based on the evidence, the Commissioner does not doubt that the correspondence would have been a substantial burden to a small parish council both in terms of expense and distraction.

Is the request designed to cause disruption or annoyance or did it lack any serious purpose or value?

61. Whether a request is designed to cause disruption or annoyance is a difficult part of the Commissioner's vexatious criteria to engage because it requires objective evidence of intention. The Commissioner did not consider that there was sufficient evidence to demonstrate this was the complainant's specific intention. However, the Commissioner agrees with the council that the value in responding to these particular requests was very limited, particularly given that information about the gross salary and the clerk's qualifications was already readily available. In relation to the request concerning a breakdown of the clerk's time to respond to the previous request, the Commissioner considers that the timing of this request meant that it was of limited value. If the council had actually applied section 12(1) in the future, that would be a more appropriate time to engage about those issues. The Commissioner accepts the council's view that it is likely that accessing that information at the time

of the request would only have lead to an ultimately unproductive exchange which is likely to have focused on criticising the competency of the clerk and distracted the council from considering the concerns expressed by the complainant relating to the previous request.

Procedural findings

62. Section 1(1) of the FOIA provides a general right of access to recorded information held by public authorities. If information cannot be validly withheld, it should be disclosed within 20 working days in accordance with section 10(1). The authority failed to provide some information to the complainant without appropriate justification. The Commissioner has therefore found the authority in breach of section 1(1) and 10(1) of the FOIA in this case.

Other matters

Refusing requests

63. The Commissioner was particularly concerned that in spite of his express guidance on the subject, the council failed to appreciate that it may not withhold information under the FOIA without citing a valid exemption and providing full rationale. This may be indicative of training needs at the council and the Commissioner trusts that the council will give serious consideration to making improvements in the future. As already indicated to the council, there is a significant amount of detailed guidance materials on the Commissioner's website at www.ico.gov.uk to help the authority to understand its obligations under the FOIA.

Internal reviews

64. In accordance with section 17(7) of the FOIA, when a public authority refuses to provide information on the basis that it is exempt under the FOIA, it needs to provide details of its internal review procedure or state that it does not have one. The Commissioner understands that the authority does operate an internal review however it failed to operate this when the complainant expressed dissatisfaction with the way his original request had been handled. Any expression of dissatisfaction with the original response should be taken as a request for an internal review and the Commissioner trusts that the council will make appropriate improvements in the future in this regard.

Right of appeal

65. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)
GRC & GRP Tribunals,
PO Box 9300,
LEICESTER,
LE1 8DJ

Tel: 0300 1234504

Fax: 0116 249 4253

Email: informationtribunal@hmcts.gsi.gov.uk

Website: www.justice.gov.uk/guidance/courts-and-tribunals/tribunals/information-rights/index.htm

66. 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.
67. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed

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