

**Freedom of Information Act 2000 (FOIA)
Environmental Information Regulations 2004 (EIR)**

Decision notice

Date: 12 May 2015

Public Authority: Vehicle Certification Agency (VCA)
(an executive agency of the Department of Transport)

Address: 1 The Eastgate Office Centre
Eastgate Road
Bristol BS5 6XX

Decision (including any steps ordered)

1. In a three part request, the complainant has requested type approval information about a particular type of Porsche vehicle. The VCA has refused to comply with part 1 of the request, which it says is partly vexatious under FOIA section 14(1) and, to the extent that it also contains environmental information, is manifestly unreasonable under regulation 12(4)(b) of the EIR. It has refused to comply with part 2 of the request as to do so would exceed the appropriate limit under section 12 of the FOIA for some of the information and, to the extent that it also contains environmental information, responding to the request would also be manifestly unreasonable under regulation 12(4)(b). It says it does not hold the information requested at part 3.
2. The Commissioner's decision is as follows:
 - Part 1 of the request is manifestly unreasonable by virtue of being vexatious under regulation 12(4)(b) of the EIR, and the VCA is correct not to comply with it. The public interest favours withholding the information.
 - Part 2 exceeds the appropriate cost limit under section 12 of the FOIA for some of the information. In relation to the information which constitutes environmental information it is also a manifestly unreasonable request by virtue of cost under regulation 12(4)(b) of the EIR and the public interest also favours withholding the information. The VCA is therefore correct not to comply with it.

- On balance, the VCA does not hold the information requested at part 3 and has therefore met its obligations under section 1 of the FOIA and regulation 5 of the EIR.
3. The Commissioner does not require the VCA to take any further steps.

Request and response

4. The Commissioner notes that under the FOIA, the VCA is not a public authority itself, but is an executive agency of the Department for Transport (DfT), which is responsible for the VCA. The public authority in this case is actually therefore the Department for Transport not the VCA. However, for the sake of clarity, this decision notice refers to the VCA as if it were the public authority.
5. On 21 November 2014, the complainant wrote to the VCA and requested information in the following terms:
- "I request under the Environmental Information Regulations 2004 the following information:*
- 1. All type approval documentation relating to all variants of 3.4 litre Porsche 987.2 vehicles (also known as Cayman S, Boxster S and Cayman R) that is held by VCA.*
 - 2. All correspondence between VCA and Porsche that contains any information relating to type approval or emissions or 50 km/h throttle defects of any 3.4 litre Porsche 987.2 vehicle.*
 - 3. All correspondence between VCA and SNCH that contains any information relating to type approval or emissions or 50 km/h throttle defects of any 3.4 litre Porsche 987.2 vehicle."*
6. The VCA responded on 19 December. It refused to comply with part 1 of the request as it said this is manifestly unreasonable under regulation 12(4)(b) and a repeat request under section 14(2) of the FOIA. It refused to comply with part 2 of the request, again because it is manifestly unreasonable under EIR 12(4)(b) and, under section 12 of the FOIA, because of the cost involved in complying. It suggested how the complainant might narrow down this part of their request. Finally, the VCA said it does not hold information within the scope of part 3 of the request.
7. Following an internal review the VCA wrote to the complainant on 5 January 2015. It maintained its original position.

Scope of the case

8. The complainant contacted the Commissioner on 29 January 2015 to complain about the way his request for information had been handled.
9. In its submission to the Commissioner, the VCA has acknowledged that it cited FOIA section 14(2) incorrectly in its original response to the complainant regarding part 1 of the request, as it had not complied with the request previously. It now relies on section 14(1), in addition to EIR regulation 12(4)(b), as it considers part 1 of the request to be vexatious. The VCA notified the complainant accordingly on 9 April 2015.
10. The Commissioner has focussed this aspect of his investigation on establishing whether part 1 of the request is actually a request solely for environmental information and manifestly unreasonable under EIR 12(4)(b).
11. The Commissioner has also investigated of the VCA's application of EIR regulation 12(4)(b) and FOIA section 12 to part 2, and whether it has met its obligations under regulation 5 and section 1 of the relevant legislation in respect of part 3 of the request.

Background

12. The VCA has told the Commissioner that it has been in correspondence with the complainant since October 2011. The complainant is concerned about a potential difference between the CO² figures for the UK and European version of the Porsche that he owns, and the performance of this vehicle.
13. The VCA is aware that the complainant has also corresponded with the Department for Transport and Driver and Vehicle Standards Agency (DVSA) regarding the safety of his car. The Commissioner notes that he issued a decision in a case concerning the complainant and DVSA – FS50527543.
14. The VCA is the UK's vehicle type approval authority: type approval is granted to a product that meets a minimum set of regulatory, technical and safety requirements. The VCA did not approve the Porsche vehicle in question. However, it has handled his general enquiries and responded to a number of FOIA and EIR requests and a subject access request under the Data Protection Act.
15. In 2012, the complainant requested copies of two extensions to the Whole Vehicle approval documents (e13*2001/116*0141). The VCA had obtained these in order to respond to his questions, which the VCA

handled under its reference FOI0000139. It says it would not normally be in possession of these documents. The VCA refused to disclose them and the complainant submitted a complaint to the Commissioner. The Commissioner agreed with the VCA's application of section 27 of the FOIA to the request, the complainant was notified and that particular case was resolved informally under the ICO's case reference FS50447164, without a decision notice. However, the first part of the request that is the subject of this notice is similar to the request the complainant submitted to the VCA in 2012.

16. Since 2012, the VCA says that the complainant has submitted a further five requests; two of which were requests for documents similar to those it had previously withheld and two concerned completely different vehicles.
17. The complainant has submitted a complaint about the VCA to DfT and is involved in a tribunal action to consider a dispute that he has with DVSA. In addition, the complainant pursued a complaint against the VCA with the Independent Complaints Assessor (ICA) with regard to how it had handled his enquiries. The ICA did not find in the complainant's favour.

Reasons for decision

Part 1 – is this a request for environmental information?

18. At part 1 of the request, the complainant has requested:

"All type approval documentation relating to all variants of 3.4 litre Porsche 987.2 vehicles (also known as Cayman S, Boxster S and Cayman R) that is held by VCA."

19. The Environmental Information Regulations 2004 provide public access to environmental information, specifically, that is held by public authorities.

20. Regulation 2(1) of the EIR defines "environmental information" as:

'any information...on

(c) measures..., such as policies, legislation, plans, programmes...likely to affect the elements and factors referred to in (a) and (b) [such as air, water, soil, land, energy, noise, waste] as well as measures or activities designed to protect those elements.'

21. Regulation 12(2) says that a public authority should apply a presumption in favour of disclosing environmental information.
22. The Commissioner considers that the information requested in part 1 of this request broadly concerns the state of the elements of the environment under EIR 2(1)(a), namely air.
23. He notes that the similar request in 2012 was handled under the FOIA but the Commissioner is of the view that this part of the request is, in fact, for environmental information specifically. Consequently he has focused only on the VCA's application of regulation 12(4)(b) to it.

Is part 1 a manifestly unreasonable request by virtue of being vexatious?

24. Regulation 12(4)(b) of the EIR says that a public authority may refuse to disclose information if the request for information is manifestly unreasonable. The purpose of the exception is to protect public authorities from exposure to a disproportionate burden or an unjustified level of distress, disruption or irritation, in handling request.
25. The regulation under 12(4)(b) can be used when the request is vexatious or when the cost of complying with it is too great. The VCA considers that part 1 of the request in question is vexatious.
26. As discussed earlier in this notice, the VCA has said that it dealt with a request from the complainant in 2012 that is similar to part 1 of this request, under its reference F0000139 (ICO reference FS50447164). The Commissioner has referred back to the earlier request and agrees that it is very similar. On that occasion, the VCA had initially withheld the information under section 41 (breach of confidence) and section 43 (commercial interests). After consulting the approval owners - Porsche AG – and the Luxembourg Type Approval Authority, it had revised its position; withholding the information under FOIA section 27 and EIR regulation 12(5)(a) (international relations). The Commissioner agreed that the information was exempt from disclosure under FOIA section 27.
27. In its submission to the Commissioner, the VCA has confirmed that the only information that it holds within the scope of part 1 of the request continues to be the two extensions to the Whole Vehicle approval documents, mentioned at §15, that it originally withheld from the complainant in 2012.
28. The VCA estimates that, on that occasion, it took in excess of 200 hours for staff and wider Departmental colleagues to evaluate the information and consider the implications of releasing it. The VCA says that there is no new documentation and there have been no policy changes since the Commissioner reviewed its decision in 2012.

29. The Commissioner's guidance on regulation 12(4)(b) says there is no material difference between a vexatious request under section 14(1) of FOIA and a request that is manifestly unreasonable on vexatious grounds under the EIR. In addition to exposing authorities to a disproportionate burden or an unjustified level of distress, the Commissioner's guidance on section 14(1) suggests a series of other indicators of vexatiousness, a number of which the VCA has also included in its submission to the Commissioner, as follows:
30. **Creates a significant burden:** The VCA says its resources are severely limited. It employs fewer than 200 staff worldwide and has no full time FOIA/EIR roles within the Agency. As mentioned at §28, it estimates that it had spent in excess of 200 hours processing the complainant's previous FOIA/EIR request concerning this information. The VCA argues that the further effort needed to comply with this request – it has confirmed it would have to again consult with the Luxembourg Approval Authority and Porsche – would be such a significant strain on its time and resources that it would reduce the ability of the Agency to fulfil its statutory functions.
31. **Has the effect of harassing the authority or its staff:** Handling the complainant's FOIA/EIR requests falls to one or two individuals within the VCA. The VCA says that the additional burden of work and associated stress to those individuals engaged on this work has been extremely high. It has affected their ability to meet personal and operational objectives within their work areas. In addition, the VCA says that it has even disrupted periods of planned annual leave in some cases, with the attendant frustration caused to those staff members.
32. **Can be characterised as obsessive:** The VCA considers that the complainant is unreasonably persistent in asking for information which has previously been refused, an approach that was tested through a complaint to, and review by, the Commissioner. The VCA has assured the complainant that it does not hold any additional type approval information other than the two documents already discussed, and it has explained to him why it would not normally be in possession of these. Furthermore, in a letter from the complainant to the VCA dated 17 April 2012, the complainant disclosed that he had already obtained the relevant 70/157/EEC test results from an alternative source. (70/157/EEC is a European Directive relating to permissible sound level and exhaust system of motor vehicles.) The VCA has explained to the Commissioner that, with these test results, the type approval documents serve no additional purpose to the complainant and it appears to the VCA that the complainant is pursuing it for this information as a matter of principle.

33. **Has no serious purpose or value:** The VCA has told the Commissioner that the two type approval documents in question do not contain information that would enable the complainant to identify his particular vehicle and so would not be of use to him. And as previously mentioned, the complainant already has the official 70/157/EEC results so that the type approval documents it holds – even if they could be directly linked to his car – would be superfluous.
34. The Commissioner considers that the VCA's arguments for withholding the information requested at part 1 are compelling. He is satisfied that, taking account of the background and all the circumstances of the request, the request can be categorised as vexatious and is consequently manifestly unreasonable under regulation 12(4)(b).
35. Regulation 12(4)(b) is a qualified exception which means it is subject to the public interest test at regulation 12(1)(b). This says that information can only be withheld if, in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosure. The public interest is considered from §66.

Part 2 - requests that span different access regimes

36. At part 2 of the request, the complainant has requested:

"All correspondence between VCA and Porsche that contains any information relating to type approval or emissions or 50 km/h throttle defects of any 3.4 litre Porsche 987.2 vehicle."

37. As previously noted, the regulation under 12(4)(b) can be used when the request is vexatious or when the cost of complying with it is too great. The VCA considers that part 2 of the request is manifestly unreasonable by virtue of cost. It says that it is also not obliged to comply with it under section 12 of the FOIA as to do so would exceed the appropriate limit.
38. The VCA has considered this part of the request under both regimes because some of the information captured by this request may fall under the FOIA, because it is purely administrative in nature, and some may fall under the EIR. To identify the specific items of correspondence containing information about the particular Porsche vehicle, the VCA would need to examine all the items. Without conducting an in depth analysis of all correspondence between it and Porsche, it would be not possible to ascertain whether information falls under FOIA or EIR. Consequently, the VCA has treated the requested information under both the FOIA and EIR.
39. The Commissioner has issued guidance on cases such as these. This guidance says that in order to calculate the costs involved in complying

with a request that spans different access regimes, public authorities should take two steps.

40. First, it should consider the request under the FOIA. It should then consider any additional obligations under the EIR (and Data Protection Act [DPA], where necessary). This is not quite the approach the VCA has taken. It has however considered both the FOIA and EIR in its responses to the complainant and the Commissioner, and the Commissioner has taken this into account.

Step 1 – considering the request under the FOIA

41. The VCA says it is not obliged to comply with part 2 of the request because to do so would exceed the appropriate limit under section 12 of the FOIA.

Section 12 – cost exceeds the appropriate limit

42. Section 12 of the FOIA allows a public authority to refuse to deal with a request where it estimates that it would exceed the appropriate limit to:

- either comply with the request in its entirety, or
- confirm or deny whether the requested information is held.

43. The estimate must be reasonable in the circumstances of the case. The appropriate limit is currently £600 for central government departments and £450 for all other public authorities. Public authorities can charge a maximum of £25 per hour to undertake work to comply with a request; 18 hours work in accordance with the appropriate limit of £450 set out above, which is the limit applicable to the VCA. If an authority estimates that complying with a request may cost more than the cost limit, it can consider the time taken to:

- (a) determine whether it holds the information
- (b) locate the information, or a document which may contain the information
- (c) retrieve the information, or a document which may contain the information, and
- (d) extract the information from a document containing it.

44. Where a public authority claims that section 12 of the FOIA is engaged it should, where reasonable, provide advice and assistance to help the requester refine the request so that it can be dealt with under the appropriate limit – in line with section 16.

45. To determine whether the VCA applied section 12 and section 16 of the FOIA correctly, the Commissioner has considered the VCA's

response to the complainant, and the submission it provided to him as part of his investigation.

46. The VCA says that key to its response to part 2 of the request is the word "all". It says that over the years it has entered into discussions with Porsche about a range of services that the VCA provides such as the 'Mutual Recognition' process or 'Point of Sale' service. Porsche may also have been in touch with the VCA's Management Systems Certification teams, both in the UK and overseas.
47. Consequently, identifying all the documents that might hold information within the scope of this part of the request would therefore require searches across all the network drives available to the VCA's UK offices and each of its 14 overseas locations. Since some documents may be stored on local drives, the VCA would also need to check these. In addition, while the UK Outlook email servers could be interrogated, it is not possible to remotely check individual email accounts, so these would also need to be examined. Finally, although the VCA has a project underway to digitise hard copy only files, it says there is still a huge number of hard-copy files (some of which have been archived to an external repository) that would need to be reviewed in order to make sure that no relevant information had been missed.
48. If the VCA were to identify a number of documents, it would then need to sift through each of these to see whether the content related to:
 - type approval; or
 - emissions; or
 - 50 km/h throttle defects and
 - related to 3.4 litre Porsche 987.2 vehicle.
49. The VCA has estimated that the time it would take to first identify relevant correspondence would be around 48.5 hours. This includes 16.5 hours to search the hard-drives of approximately 100 staff in various teams, 14 hours to search all its overseas drives and 8 hours to search its local Microsoft Outlook accounts. To then identify information falling within the scope of the request would then take additional time.
50. The Commissioner has considered the VCA's reasoning and estimations and considers that it is not obliged to comply with part 2 of the request because to do so would exceed the appropriate limit set out in section 12 of the FOIA.

Section 16 – advice and assistance

51. Section 16 of the FOIA places a duty on a public authority to provide advice and assistance to someone making an information request. This

includes helping an applicant refine a request so that it can be answered within the appropriate cost limit.

52. The VCA offered the complainant the opportunity to refine his request; it suggested that he be more specific about the information he wanted, such as correspondence between particular dates, or from a particular time period. The VCA also suggested to the complainant that it would only be able to identify copies of letters and emails (where they existed) from 1 January 2007 onwards. Had the complainant confirmed he was content to refine his request to that date, the VCA says it could have focussed its search on electronic and locally held hard-copy records; complying with the request within the cost threshold. The complainant did not take up this suggestion.
53. The Commissioner is satisfied that the VCA met its obligations under section 16 of the FOIA to offer advice and assistance to the complainant in respect of part 2 of this request.

Step 2 – considering any additional obligation under the EIR

54. As noted at §40, when a request appears to span different access regimes, it should first be considered under the FOIA, and then any additional obligations under the EIR (or DPA) should be considered.
55. The VCA has cited regulation 12(4)(b) of the EIR (manifestly unreasonable request by virtue of cost) in respect of part 2 of the request. Even though the Commissioner considers this part has been correctly refused under the FOIA, the VCA should still consider its obligations under the EIR because, under the Regulations, the complainant still has a separate right of access to any environmental information covered in the request. In this case therefore, the Commissioner has next gone on to consider any additional obligations the VCA may have under the EIR.
56. Under the EIR, it will only be permissible to take into account the costs related to providing environmental information as this is defined at regulation 2(1) of the EIR. However, the Commissioner's guidance says that public authorities can take into account the costs of collating all the information falling within the scope of a request as long as doing so is a necessary first step because they cannot otherwise isolate the environmental information.
57. The VCA has acknowledged that it is likely that some, but not all, of the relevant information held will be environmental information. As the request is wide ranging, it has refused the request under section 12 of the FOIA and 12(4)(b) of the EIR. In order to go on to consider its

obligations under the EIR, the VCA would have to devise a search strategy in which it only searches for the environmental information.

58. The Commissioner considers that the VCA would be unable to devise such a strategy. This is because the VCA does not have any way of knowing in advance which correspondence will contain environmental information and which won't. The VCA has consequently collated all the requested information before it can go on to isolate the environmental information. In this circumstance, the Commissioner accepts that collating all the requested information is a necessary first step because it cannot otherwise isolate the environmental information. He accepts that the costs of collating all the information can be taken into account when deciding if this part of the request is manifestly unreasonable under regulation 12(4)(b).

Is part 2 a manifestly unreasonable request by virtue of cost?

59. As explained above, section 12 of FOIA allows a public authority to refuse to deal with a request where it estimates that it would exceed the appropriate limit to:
- either comply with the request in its entirety; or
 - confirm or deny whether the requested information is held.
60. The EIR do not have a provision where a request can be refused if the estimated cost of compliance would exceed a particular limit. However, the Commissioner considers that, under the EIR, if a public authority is able to demonstrate that the time and cost of complying with a request is obviously unreasonable, regulation 12(4)(b) will be engaged.
61. The Commissioner is mindful of the fact that environmental information has been deemed to warrant its own access regime and therefore the detailed provisions of the FOIA cannot be transposed into the EIR. Nevertheless, the Commissioner considers it reasonable that, where appropriate, the FOIA should inform his understanding of the EIR.
62. Whilst there is not a directly equivalent provision of section 12 in the EIR, regulation 12(4)(b) makes clear that the intention of the EIR is not to place an obligation on public authorities to respond to any information request regardless of the burden of processing that request. The Commissioner's view is that Parliament has given some indication, in section 12 of the FOIA, of what it would consider an acceptable burden for an information request to impose upon an authority. Section 12 of the FOIA provides that a public authority is not obliged to provide information where to do so would incur a cost to it of more than £450 or 18 hours work.

63. As detailed in §42 - §50, the Commissioner considers that the VCA's explanation of the time necessary to comply with this part of the request is credible and reasonable. He has decided that the VCA is entitled to refuse to comply with it under section 12 of the Act, because to do so would exceed the appropriate limit of £450.
64. Paragraphs 61 to 62, concerning the use of section 12 of the FOIA to inform the understanding of regulation 12(4), have led the Commissioner to conclude that regulation 12(4)(b) is also engaged. The Commissioner has taken account of the VCA's estimate of the time necessary to comply with the request, which is in excess of the appropriate limit set out in the FOIA, and the particular circumstances of this case. This includes the cost of carrying out the necessary first step of collating all the information, as described at §58. The Commissioner has therefore concluded that part 2 of the request is also manifestly unreasonable within the meaning of regulation 12(4)(b), and the VCA is not obliged to comply with it.

Regulation 9 – advice and assistance

65. The Commissioner considers that the VCA met its obligations under regulation 9 of the EIR – to provide the complainant with advice and assistance – for the same reasons that he found it met its obligations under section 16 of the FOIA, detailed at §51 to §53.

Public interest test

66. As noted at §35, regulation 12(4)(b) is a qualified exemption which means it is subject to the public interest test at regulation 12(1)(b). This says that information can only be withheld if, in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosure. The Commissioner has concluded that the VCA correctly applied regulation 12(4)(b) to part 1 of the request because it was vexatious and to part 2 because of the time and cost it would take to comply with it. He has gone on to consider the public interest arguments with respect to both these parts.

Public interest arguments in favour of disclosing the information

67. The VCA accepts that disclosing the information would satisfy the complainant's interest. It also acknowledges that there is a general public interest in knowing whether a particular product has been type approved and is therefore more likely to be safe and environmentally friendly. There is also the general public interest in making sure that government activities are properly scrutinized.

Public interest arguments in favour of withholding the information

68. The VCA has noted in its submission that the information has previously been considered by the Commissioner who found it exempt from release under section 27 of the FOIA.
69. It estimates that it would take approximately 45 hours to search, worldwide, for information within the scope of the request – this would distract the VCA's limited resources from delivering its core services.
70. The VCA is not aware of any evidence concerning the Porsche vehicle in question that would suggest the requested information is of wider public interest.
71. Although the contents of any retrieved correspondence would not be known until each item had been identified and reviewed, the VCA considers it likely that the subject material would be limited to type approval matters. VCA says that type approval testing practices and techniques are subject to statutory legislation, and this is freely available.
72. Finally, the VCA says that emissions information for the vehicle in question is already publicly available.

Balance of the public interest

73. The Commissioner has considered the public interest arguments as they relate to the VCA's application of regulation 12(4)(b) to part 1 and part 2 of the request. He has concluded that, because of the effort it would take to comply with the request, and the resulting distraction to the VCA, combined with the lack of evidence that would suggest the information is of wider public interest, and the fact that relevant information about the vehicle's emissions is already available, the public interest favours withholding the information covered by parts 1 and 2 of the request.

Part 3 - does the VCA hold this information?

74. At part 3 of the request, the complainant has requested:

"All correspondence between VCA and SNCH that contains any information relating to type approval or emissions or 50 km/h throttle defects of any 3.4 litre Porsche 987.2 vehicle."

75. The VCA told the complainant that it does not hold any correspondence that meets these criteria. It has told the Commissioner that very few personnel within the Agency would have had dealings with any other European Type Approval authorities such as SNCH (Société Nationale de

Certification et d'Homologation) and those that would have, have been with the VCA for more than ten years. When approached, those personnel were able to confirm with confidence that they were only aware of the small amount of correspondence with SNCH that concerned the release of the two approval documents discussed previously in this notice. The VCA said that it did not rule out odd communications concerning EC committee meetings and that these would be easy to identify and disregard.

76. Because the VCA has been answering questions about this particular Porsche vehicle for some time, the question as to whether there has been any correspondence with the Luxembourg authorities has come up before. The VCA says it can therefore confirm with some certainty that it has not approached the SNCH on the matter that is the subject of the request, nor had the SNCH been in contact with the VCA about it. It had nonetheless carried out searches of its main UK network drives for 'SNCH' and 'Luxembourg'. As it had expected, the only correspondence retrieved was that in which the VCA had sought permission to release the aforementioned two type approval documents. The VCA had not disclosed it to the complainant because it considered it concerned the principles for releasing this type of information and did not contain the specific information covered by part 3 of the complainant's request. The Commissioner has seen this correspondence and is satisfied that it is as the VCA describes.
77. The Commissioner is prepared to accept that, on balance, the VCA does not hold the information within the scope of that referred to in part 3 of the request, and has met its obligations under section 1 of the FOIA and regulation 5 of the EIR.

Right of appeal

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

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

Tel: 0300 1234504

Fax: 0870 739 5836

Email: GRC@hmcts.gsi.gov.uk

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

79. 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.
80. 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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