

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 26 April 2018

Public Authority: East of England Ambulance Service NHS Trust

Address: Whiting Way
Melbourne
Cambridgeshire
SG8 6EN

Decision (including any steps ordered)

1. In ten requests the complainant has requested information from East of England Ambulance Service NHS Trust ('the Trust') about aspects of its performance and its operations. The Trust has refused to comply with the requests which it says are vexatious under section 14(1) of the FOIA.
2. The Commissioner's decision is as follows:
 - The complainant's ten requests are not vexatious and the Trust is not entitled to rely on section 14(1) of the FOIA with regard to these requests.
3. The Commissioner requires the Trust to take the following step to ensure compliance with the legislation:
 - Issue a fresh response to the ten requests in the appendix to this notice that does not rely on section 14(1) of the FOIA.
4. The public authority must take this step within 35 calendar days of the date of this decision notice. Failure to comply may result in the Commissioner making written certification of this fact to the High Court pursuant to section 54 of the Act and may be dealt with as a contempt of court.

Request and response

5. The complainant submitted nine separate requests for information to the Trust on 9 September 2017. These are given in the appendix to this notice, with the reference numbers that the Trust assigned to each.
6. The Trust responded on 21 September 2017. It categorised the requests as vexatious under section 14(1) of the FOIA and refused to comply with them.
7. Following an internal review the Trust upheld its original position.

Scope of the case

8. The complainant contacted the Commissioner on 28 October 2017 to complain about the way her requests for information had been handled.
9. The Commissioner has reviewed the original nine requests the complainant submitted and how the Trust referenced them in its response to the complainant and its internal review. The Trust split one of the requests into two - to become request 6 (12543) and request 7 (12546) - but appears to have overlooked one of the requests concerning disciplinary investigations. This request has now become request 10. In the circumstances the Commissioner has assumed that the Trust also considers this request to be vexatious.
10. In March 2018, the Trust had provided a section 14(1) submission in respect to a separate investigation the Commissioner carried out as a result of a complaint by the same complainant – FS50702860¹. The Commissioner asked the Trust whether that submission was intended to also cover the current requests and invited it to provide further submissions if it considered this was necessary. In the absence of any communications from the Trust on this matter the Commissioner has considered the Trust's earlier submission in the course of her current investigation.

¹ <https://ico.org.uk/media/action-weve-taken/decision-notices/2018/2258657/fs50702860.pdf>

11. The Commissioner's investigation has focussed on whether the 10 requests submitted on 9 September 2017 are vexatious under section 14(1) of the FOIA.

Reasons for decision

12. To clarify the matter for the Trust, section 14(1) of the FOIA is not an exemption in Part II of the Act. Part II concerns information that is exempt from disclosure. Section 14(1) is contained in Part I of the Act, which deals with procedural matters, and it releases a public authority from its obligation to comply with a request if the request is vexatious.
13. The term 'vexatious' is not defined in the FOIA. The Commissioner has identified a number of 'indicators' which may be useful in identifying vexatious requests. These are set out in her published guidance on vexatious requests. In short they include:
 - Abusive or aggressive language
 - Burden on the authority
 - Personal grudges
 - Unreasonable persistence
 - Unfounded accusations
 - Intransigence
 - Frequent or overlapping requests
 - Deliberate intention to cause annoyance
14. The fact that a request contains one or more of these indicators will not necessarily mean that it must be vexatious. All the circumstances of a case will need to be considered in reaching a judgement as to whether a request is vexatious.
15. The Commissioner's guidance suggests that if a request is not patently vexatious the key question the public authority must ask itself is whether the request is likely to cause a disproportionate or unjustified level of disruption, irritation or distress. In doing this the Commissioner considers that a public authority should weigh the impact of the request on it and balance this against the purpose and value of the request.
16. Where relevant, public authorities also need to take into account wider factors such as the background and history of the request.
17. In the earlier submission to the Commissioner the Trust first provided a history and context to the previous requests and, the Commissioner has assumed, the current requests. It advised the Commissioner that it has received 171 requests from the complainant from 1 November 2015 to 31 October 2017 and noted that this is 13.4% of the Trust's FOI

workload in this time period. It said that of the 67 internal review requests received in this timeframe, 31 were from the complainant, which constitutes 46.3% of the workload.

18. The Trust argued that this imposed a considerable burden on its FOI team and the wider departments, and caused additional stress to a number of hard-working teams. The Commissioner notes that a proportion of these requests (and internal review requests) will have been submitted after the complainant submitted the current requests in September 2017 and therefore she cannot include these in her considerations.
19. The Trust noted the Commissioner's published guidance on section 14(1) and the case of Information Commissioner versus Devon County Council and Dransfield. In that case it is stated that a public authority should not consider that section 14(1) should be applied in the most extreme circumstances only but rather, it should be considered in any case where the authority believes the request is disproportionate or unjustified.
20. The Trust confirmed that the reason for refusing the requests was not due to any concern about the consequences of releasing the information but due to the nature of the requests. The Trust advised the Commissioner that it did provide information relating to tail breaches and Unit Hours Production (UHP) in response to three previous requests received in January, April and May 2017, relating to different months. This has a bearing on three of the requests in the current case.
21. **Disproportionate or unjustified level of disruption:** The Trust said that it is committed to being an open and transparent organisation and strives to achieve this through its website and responses to FOI requests and media requests. However, on this occasion, it said it feels that the requests in question have, and still are, causing a disproportionate level of disruption to its FOI team, Informatics Department and the Operations Directorate.
22. **Purpose and value of request:** The Trust noted that, although the complainant did not include any comments or context around these specific requests, it is aware of the complainant's circumstances, which it passed on to the Commissioner. The Trust said it accepts that the complainant is likely to believe there is value behind these requests but it believes this value is restricted to the complainant's own personal aims and does not serve a wider public interest. When balancing the serious purpose of the requests against the detrimental impact caused to the authority, the Trust told the Commissioner that it believes that the unjustified irritation and distress caused to the Trust far outweighs any possible value to the complainant.

23. **Burden on the authority:** The Trust considered that the number of requests the complainant has submitted has caused considerable disruption to the Trust and been an excessive burden on relevant Trust teams. It said that during 2017, the complainant began making six to eight requests per month. Although these were different requests each time, the Trust said it received these on a regular monthly basis.
24. Although most of these requests did not meet the eighteen-hour threshold in terms of the FOIA's section 12 provision (cost exceeds appropriate limit), the Trust said that a number of the previous requests took it an inordinate amount of time to complete. This imposed a significant burden on the Trust, specifically the FOI team and the wider departments involved in collating the information.
25. The Trust said that in relation to these specific requests, it took a number of hours to validate the data to ensure it was accurate. (The Commissioner assumes here that the Trust is in fact referring to its responses to the complainant's earlier requests for particular information for different months.) Although it appreciated that this did not fall within the threshold of the section 12 provision, the Trust said the effect was grossly oppressive on its core work and required the Trust to divert staff away from core functions.
26. **Campaigns and personal grudge:** According to the Trust these requests, taken with the other 161 requests up to 31 October 2017, have constituted a deliberate intention to cause annoyance, and is part of a wider campaign to discredit and disrupt the Trust due to the sheer volume of requests. The Trust said it also has good reason to believe that a number of other FOI requests it has received are also from this complainant using pseudonyms, one of which is currently going through the Commissioner's complaint and appeal process.
27. The Trust also believed that this complainant has a personal grudge against a number of senior members of the Trust, which it said is reflected in the high number of requests received and the tone of some of these requests and other correspondence concerning the current Trust CEO and a specific Director.
28. **Intransigence:** In the Trust's view, perhaps key to its belief that these requests are vexatious, is that the complainant has not been willing to engage with the Trust to try and resolve some of the issues and explore ways to provide this information without the need to impose such excessive conditions on the Trust. The Trust said it has tried to engage with the complainant a number of times to understand if it can provide information through a different route. The Trust appreciates that it would be useful to share some information with the complainant outside of the FOIA. However it said that whenever this has been suggested,

the complainant was always clear that she did not believe that she would receive accurate or timely information. The Trust said it has asked the complainant, on a number of occasions, for a comprehensive list of the data that she requires regularly during Staff Partnership Forum (SPF) meetings; however this has not been forthcoming.

29. The Trust told the Commissioner that the level of work created by the complainant's repeated requests is not sustainable for either its FOI team or the wider departments involved in these requests (the Informatics and Operations departments). It said responding to the (previous) requests has taken numerous members of staff away from their core work for considerable periods of time and has caused a disproportionate and unjustified burden.
30. The Trust observed that its FOI team was so engaged with completing, and supporting the completion of, these numerous (previous) requests that it has been distracted away from working on more proactive publication projects. It gave as an example 'Transparency' pages on its website, which the Trust said are additional pages on its website where routine information is published in relation to frequent regular requests. Finally, the Trust said that it believes that the work required to complete the complainant's frequent requests is disproportionate to the legitimate aims of the FOIA.

The Commissioner's analysis

31. The two requests considered in FS50702860 concerned tail breaches and UHP for May and June 2017. In that case the Commissioner found that those requests could not be considered to be vexatious. The complainant's current requests are for a wider variety of information but include another request for tail breach information for July/August 2017 (request 4) and other requests for UHP information for August 2017 (request 6) and for UHP information for August 2016 (request 7). The Commissioner has first considered whether requests 4, 6 and 7 are vexatious under section 14(1). She has then considered the remaining seven requests.

Requests 4, 6 and 7

32. During the FS50702860 investigation the complainant provided the Commissioner with material that she considers is evidence that her requests for tail breach and UHP information have a purpose and value and, as such, cannot be categorised as vexatious.
33. First is a paper the Unison union appears to have been prepared for an SPF meeting on 7 February 2018. In this paper Unison says that it has been raising FOI requests monthly to try to gain access to the

information it needs to monitor trends and evidence change for its members.

34. The complainant next referred the Commissioner to the Hansard record from an adjournment debate on 2 February 2018, raised by a local MP. The debate concerns the Trust specifically and discusses concerns about delays and patient harm, and the Trust not making information available (through its application of section 14(1) to the current, and later, requests).
35. The complainant has advised the Commissioner that the NHS England (NHSE) "risk summit", referred to in the Minister's response to the adjournment debate, was put in place as a result of the concerns over patient harm. The summit outlined that the Trust must increase its resources and specified an increase in UHP, which should be met each week. This further supported the complainant's view that the request for the disputed information is justified and proportionate and that the information should be provided openly.
36. The complainant also told the Commissioner that there has been a lot of media interest in delays and other concerns about the Trust, with the media interest including reports of a senior whistle blower raising concerns about patient harm and patient deaths as a result of delays. She provided the Commissioner with a link to the relevant article published in 'HSJ' on 19 January 2018 and said that similar reports were published in regional papers, regional television news and also featured on the BBC's 'One Show'.
37. The complainant said that the UHP data she has requested would show how many resources the Trust is allocating and the tail breaches information relates to delays. She said that this information has been requested as a proportionate means of determining the safety of the Trust's service. The complainant noted that this information used to be provided freely on a monthly basis. She considered that, due to escalating concerns over lack of resources over the winter, and delays that have occurred, it was very likely that the Trust had withheld this information potentially to hide a worsening of the situation.

The Commissioner's decision

38. The complainant submitted her requests in September 2017, with the Trust providing a response also in September 2017. The Commissioner has noted that the evidence the complainant has submitted that relates to tail breaches and UHP concerns events – debates and media interest – from the early part of 2018. Generally, when considering complaints, the Commissioner takes account of the situation as it was at the time of

the request and disregards things that may have then happened some time after the request was submitted, and responded to.

39. However, as in the earlier investigation, the Commissioner is inclined to include the subsequent published and broadcast interest in the Trust in her deliberations with regard to requests 4, 6 and 7. She considers that the concerns that finally gave rise to this interest would have arisen over a number of months and may well have been emerging around the time the complainant submitted these requests.
40. The Commissioner has noted that the Trust has released similar information to the complainant in response to previous requests and that, according to the complainant, this information used to be routinely released. The Trust argued that it would be a burden to comply with requests for this information. However, it has not gone into any detail to explain why this is the case ie what work is involved, and it has suggested that complying with similar requests previously has not met the cost/time threshold under section 12(1) of the FOIA. And again, the Commissioner wonders if, having responded to similar requests previously, the Trust does not now have the processes already in place to enable it to comply with the requests for this information more efficiently. Furthermore, that responding to a request is a burden does not make that request vexatious; for a request to be vexatious the burden must be disproportionate to the request's value.
41. The Commissioner again tends to the view that these requests *do* have a value. Concerns have been raised about the Trust's performance and the complainant has explained that this information – which concerns the allocation of resources and delays in responding to incidents for particular months – would help to identify any trends associated with the Trust's performance: its performance in these areas could be shown to be improving, staying the same or deteriorating.
42. Taking account of all the circumstances of these three requests, the Commissioner is inclined to the view that these particular requests are again not vexatious, on this occasion. First, the complainant's motive. The Commissioner is not persuaded that the complainant's motive is to deliberately annoy the Trust. The Commissioner accepts that the complainant is motivated by concerns about the Trust's performance in certain areas, and possible risks to service users. In this case, the complainant has again requested the same information for different months/years in order to identify any trends in the Trust's performance and to see whether the Trust is taking the steps the NHSE risks summit required. This information for earlier months has been released in response to previous requests.

43. Next, given the subsequent media and parliamentary interest in the Trust, involving possible harm to patients and patient deaths, the Commissioner considers that the requests have a serious purpose. Complying with the requests may well involve a lot of work for the Trust and its staff but again the Commissioner considers that the requests have sufficient purpose and value such that any burden is not disproportionate.
44. The Upper Tribunal and Court of Appeal in the Dransfield case described the complainant's requests as representing a "*manifestly unjustified, inappropriate or improper use of a formal procedure*" and decided they were therefore vexatious. The Commissioner has not been persuaded in the current case that, at this point, these three of the complainant's requests represent the same manifestly unjustified, inappropriate or improper use of the provisions of the FOIA. She has therefore decided that requests 4, 6 and 7 are not vexatious and that the Trust cannot apply section 14(1) to them.

Requests 1, 2, 3 5, 8, 9 and 10

45. The complainant's remaining seven requests concern: staff retention, Dignity at Work cases, capability hearings (which the Commissioner understands concerns staff performance), staff breaks, A19 data (which the Commissioner understands concerns complaints, concerns and feedback), staff annual leave and disciplinary investigations.
46. With regard to these seven requests more broadly, the complainant has advised the Commissioner that [in October 2017] she provided the SPF with a paper that showed that the SPF was now providing a range of the data that she has requested. However the data being provided was for the months of September 2017 onwards. The complainant does not consider it helpful for the Trust to provide [at least some of] the requested information for September 2017 onwards but to categorise the requests for the same information for July/August as vexatious.

The Commissioner's decision

47. Based on the information formerly provided by the Trust, the Commissioner has again not been persuaded that the complainant is deliberately setting out to annoy and disrupt the Trust purely out of a personal grudge she has against its senior management.
48. The Commissioner has, however, noted the very high volume of requests that the complainant has submitted to the Trust; on average seven per month from November 2015 to October 2017 with the current 10 requests having been submitted on the same day in September 2017.

49. The Commissioner recognises that complying with the number of requests the complainant has submitted up to and including the current requests has added significantly to the workload of the relevant teams: ten separate requests – a number of which are multi-part requests – is a lot of requests to submit in just one day. Very often, the volume of requests submitted by a complainant over a period of time can be the factor that finally results in a new request being categorised as vexatious. However, as she does in all cases, the Commissioner has considered the specific circumstances of this complaint.
50. It appears that the Trust may have previously provided the information requested in request 8 for previous months. It may also be the case that it has previously provided the information requested in some or all of the other six requests and that, from October 2017, the Trust provided at least some of the requested information for the month of September 2017 and onwards. From the information provided to the Commissioner it appears to her that there are some inconsistencies generally with the Trust's arguments and approach to providing information. There is some evidence of the Trust providing information, and then stopping providing it; agreeing to provide it outside of the FOIA to the union and to the complainant and then not doing so, and also publishing some information and then deciding not to continue to do so.
51. In addition, the complainant disputes that she has failed to engage with the Trust outside of FOIA. The Commissioner notes that the Trust refers to having asked the complainant for a list of the information she wants and telling the Commissioner that that the complainant did not provide this. The complainant meanwhile says that she *has* cooperated with the Trust and the SPF paper from October 2017 (paragraph 46) suggests that a list of required information was provided to the Trust.
52. The second SPF document from February 2018 (paragraph 33) also suggests that the union has tried to advise the Trust on what information it is seeking but that the Trust does not keep up with the arrangement for providing information that has been agreed. (This and the October document both post-date the requests but, as has been previously pointed out, the circumstances surrounding these requests have been going on for some time and would more than likely have been happening at the time the requests were submitted.)
53. However, central to the Commissioner's considerations is the purpose and value of these remaining seven requests and balancing this against the work involved in complying with them. Although not directly linked to the matters discussed in the previous complaint, and earlier in this notice regarding the first three requests, the subject of the seven requests – which include late finishes, meal breaks, missed annual leave

- do broadly tie in with real and genuine concerns about the Trust's overall performance, staff welfare and ultimately, patient safety.

54. For the above reasons the Commissioner is therefore not persuaded that the remaining seven requests can be categorised as vexatious. It seems to the Commissioner that, at September 2017, the complainant considered she had no choice but to use the FOIA to obtain the information she was seeking. And crucially, the Commissioner considers that the requests have sufficient value and purpose such that the work the Trust would need to do to comply with them is not disproportionate. As with requests 4, 6 and 7 above, the Commissioner has not been persuaded that, at this point, these remaining requests represent a manifestly unjustified, inappropriate or improper use of the provisions of the FOIA. She has therefore decided that requests 1, 2, 3, 5, 8, 9 and 10 are not vexatious and that the Trust cannot apply section 14(1) to them.
55. In her decision in FS50702860 the Commissioner noted the number of requests the complainant had made to the Trust and, irrespective of that decision, considered that the complainant might reach a line where further requests might become vexatious. This remains the case and any future complaint will again be considered on its own merits.

Right of appeal

56. 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

57. 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.
58. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed

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

APPENDIX

Request 1 – Trust reference 12535

"Please could you provide me with the number of frontline staff (Paramedics, ECPs, CCPs, Senior Paramedics, Senior EMTs, EMTs, ECAs, IAPs, AAPs, HCRT), who have moved out of frontline A&E roles, during August 2017.

If you could provide this data as the total number of staff who have left the trust, by SLM area, and the total number of staff who have moved into non front-line roles, by SLM, that would be great.

If the information could be provided in this format as my previous request (7069, i.e. also broken down by clinical grade), that would be appreciated."

Request 2 – Trust reference 12536

"Please can you provide for July and August 2017, by SLM area, and by PTS, A&E Ops, EOC or 'other':

1. The number of open dignity at work cases:

The number of cases that have been open for 30 days.

The number of cases that have been open for 60 days.

The number of cases that have been open for 90 days.

The number of cases that have been open for 120 days.

The number of cases that have been open for 150 days.

The number of cases that have been open for 180 days.

The number of cases that have been open for 210 days.

The number of cases that have been open for 240 days.

The number of cases that have been open for 270 days.

The number of cases that have been open for 300 days.

The number of cases that have been open for 330 days.

The number of cases that have been open for over 365 days.

The number of cases that have been open for over 547 days

The number of cases that have been open for 730 days.

2. Please also provide for each SLM area the longest timeline for a current dignity at work case.

3. As well as dignity at work complaints, can you also provide the above data for individual and collective grievances (as separate figures please)."

Request 3 – Trust reference 12538

"1. Please can you provide the number of capability hearings across the Trust, as monthly figures, for July and August 2017.

2. Please can you also provide the number of dismissals as a result of capability over the same period.

3. Please can you further break down these hearings and dismissals, as an overall figure by SLM area, for each month - i.e. xx number in West Essex dismissed, xx number hearings."

Request 4 – Trust reference 12539

"1. Please can you provide the red and green tail breaches by CCG and by SLM area, as well as the overall performance for the Trust, as monthly figures, for July and August 2017.

2. Please include the percentage of breaches as well as the number of breaches and the number of incidents, per month.

3. Please can you provide the tail breaches separately for each call category, ie separate figures for each month by R1, R2, G1, G2, G3 and G4.

4. Please also provide the UHP for DSAs and RRVs monthly, for July and August 2017, by SLM area and if possible by CCG.

Please include RRV officer hours if possible - as I understand this is the UHP which is given to Commissioners and is also recorded information held by the Trust. Please can I also ask that all of the above information UHP is further split down to show PAS and Trust UHP (both for RRVs and DSA by area).

5. Please can you also discount the non frontline emergency ambulances from the UHP (HCRT and ITV vehicles) - as these do not respond to emergency calls and the majority of the time they are not crewed by a Paramedic or EMT."

Request 5 – Trust reference 12541

"Please could you provide the number of staff that had a late break or a missed break by SLM area for 1st August - 31st August 2017.

As well as the overall data, please can you also provide the data broken down per day. For the monthly data (1 - 25th), if its possible to also give the percentage of staff affected (i.e. on a DSA there would be x2 staff, rather than counting them as a single crew) who had a late or missed break, as a percentage of total staff working, by SLM area, that would be very helpful.

Please can you also provide me with any date/times where gold command removed the fixed meal breaks. Please note, I am not requesting copies of gold notes - just details of when gold command removed the fixed meal break points (ie the dates/times)."

Requests 6 and 7 – Trust references 12543 and 12546

*"Please can you provide the following as an FOI request:
The number of OOS hours where crews are travelling back to base past the end point of their shift, per day in August 2017 and for August 2016, by SLM area. Please can you also break this down into RRVs and DSAs.*

Please can you explain how this data is collected and produced.

Please can you also confirm if EOC sign crews off the CAD prior to them returning to base at shift end, and if it is known whether crews do not book clear prior to travelling back to base when past shift end time. If the above data could be provided in the same format as F19130, that would be appreciated."

Request 8 – Trust reference 12547 (re A19 information)

"Please can you provide the attached information for August 2017."

Request 9 – Trust reference 12549

"Please can you provide the following information:

- 1. The total number of staff who lost more than 15 hours annual leave within their leave year.*
- 2. The total number of staff who lost more than 20 hours annual leave within their leave year.*
- 3. The total number of staff who lost more than 25 hours annual leave within their leave year.*
- 4. The total number of staff who lost more than 30 hours annual leave within their leave year.*
- 5. The total number of staff who lost more than 40 hours annual leave within their leave year.*
- 6. The total number of staff who lost more than 50 hours annual leave within their leave year.*
- 7. The total number of staff who lost more than 60 hours annual leave within their leave year.*
- 8. The total number of staff who lost more than 70 hours annual leave within their leave year.*

9. *Out of the staff above that lost leave, please also give the number and percentage of the staff who lost leave due to long term sickness, or were on maternity leave.*

10. *Please provide the above answers questions 1 – 9 for August 2017, and split into A&E Operations (please show the data for each SLM area), EOC staff (please split this down into each EOC), and other (all other directorates).*

***'lost leave' refers to any annual leave hours that were not taken during their current leave year - i.e. regardless of whether leave was paid in lieu of taking it, whether leave was carried over to their next leave year, or whether leave was lost."*

Request 10 – no Trust reference

"1. Please can you provide the number of disciplinary investigations by SLM area and further split into PTS, A&E Ops, EOC or 'other', per month, for July and August 2017.

2. Please can you provide the number of these investigations (also stating SLM area and directorate for each) that:

Have been open for 30 days.

Have been open for 60 days.

Have been open for 90 days.

Have been open for 120 days.

Have been open for 150 days.

Have been open for 180 days.

Have been open for 210 days.

Have been open for 240 days.

Have been open for 270 days.

Have been open for 300 days.

Have been open for 330 days.

Have been open for over 365 days.

Have been open for over 547 days

Have been open for over 730 days.

3. Please also provide for each SLM area and directorate for the longest timeline of a current disciplinary investigation.

4. Please can you provide the number of suspensions by SLM area and by PTS, A&E Ops, EOC or 'other', per month, for July and August 2017.

5. Please can you provide the length of time these suspensions have been in place (also stating SLM area and directorate for each):

*The number that have been in place for 30 days.
The number that have been in place 60 days.
The number that have been in place 90 days.
The number that have been in place 120 days.
The number that have been in place 150 days.
The number that have been in place 180 days.
The number that have been in place 210 days.
The number that have been in place 240 days.
The number that have been in place 270 days.
The number that have been in place 300 days.
The number that have been in place 330 days.
The number that have been in place for over 365 days.
The number that have been in place for over 547 days
The number that have been in place for over 730 days.*

6. Please can you provide the number of clinical variations that have taken place for July and August 2017, by SLM area. Please can you provide separate numbers of stage 1 and stage 2."