

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 14 December 2020

Public Authority: National Police Chiefs' Council
Address: 1st Floor
10 Victoria Street
London
SW1H 0NN

Decision (including any steps ordered)

1. The complainant has requested information about a mental health programme from the National Police Chiefs' Council (NPCC). The NPCC disclosed some information, withheld some, citing section 43(2)(Commercial interests) of the FOIA, and advised that some information was not held. During the Commissioner's investigation, the NPCC disclosed some information and also located further information, which it withheld, citing section 22(A) (Research) of the FOIA. The information withheld under section 22(A) was subsequently published, however, not in its entirety as none of the appendices referred to in the main document were included.
2. The Commissioner has considered the application of section 43(2) to part (b) of the request and section 22(A) to the appendices at part (e) of the request. She finds that 43(2) was properly engaged and that the public interest favours maintaining the exemption (a small amount of information withheld under section 43(2) was deemed suitable for disclosure by the NPCC, but this has not yet been actioned so there is a step to do so below). She also finds that 22(A) does not apply to the appendices so they should be disclosed. Furthermore, where noted in the appendices, she finds that sections 40(2) (Personal information) and 31(1) (Law enforcement) are not engaged.
3. The Commissioner requires the NPCC to take the following steps to ensure compliance with the legislation:
 - disclose the information referred to in paragraphs 19 and 20 below; and,

- disclose the appendices referred to in the published report, with any staff names redacted.
4. The NPCC must take these steps within 35 calendar days of the date of this decision notice. Failure to comply may result in the Commissioner making written certification of this fact to the High Court pursuant to section 54 of the Act and may be dealt with as a contempt of court.

Background

5. According to the NPCC website¹:

“National counter terrorism policing has commissioned a pilot programme to embed Mental Health practitioners with Counter Terrorism Police.

Their remit is to identify referrals to Prevent that may have mental health difficulties at the earliest possible opportunity and, where appropriate, to assist them in accessing mainstream services for help.

The pilot, which was launched in April 2016, is split across three areas – West Midlands, North West and London - and will conclude in March 2017. These areas were chosen because of their existing close links with NHS partners. Collectively the three hubs aim to provide a national resource although the majority of their cases will be local referrals.

The development of the service was based on a programme of work undertaken by Birmingham and Solihull Mental Health NHS Foundation Trust between 2012-2016. The aim of this work was to explore the mental health needs of individuals referred to Prevent and develop effective ways of providing help and diverting them to mental health services. Activities included an evaluation of current pathways, joint working and training courses, research and case management. The research included a review of 657 individuals referred to Prevent nationally to explore the prevalence of a broad range of mental health and psychological difficulties. This was identified in up to half of the cases.

¹ <https://www.npcc.police.uk/NPCCBusinessAreas/TAM/MentalHealthPilotHubs.aspx>

The cases related to a range of ideologies – mainly Islamist but also extreme right wing, animal rights or where no clear ideology was identified.

The Mental Health Hubs also incorporate best practice from other established mental health services, such as Street Triage and Liaison and Diversion services and FTAC (the Fixated Threat assessment Centre) where NHS and Police work in close partnership to identify and support vulnerable individuals with mental health difficulties.

Funding for the pilot and the evaluation is provided by national counter terrorism policing, the NHS and the Home Office”.

6. The NPCC has also provided the following background information:

“The following is provided as background information regarding the Prevent Service, the role of the Trust in establishing and the development of what is a unique service model and approach to meeting requirements of the Office of Security and Counter Terrorism as part of a national framework exercise.

Between 2012-2014 Birmingham and Solihull Mental Health NHS Foundation Trust (BSMHFT) was successful in securing an Office of Security and Counter Terrorism (OSCT) funded project to support the local ‘Channel panel’ (a multi-agency approach and panel to identify and provide support to individuals who are at risk of being drawn into terrorism) and where these same individuals are presenting with mental health needs.

In order to develop the overall approach and service specification, the BSMHFT team undertook consultancy and case consultancy, delivering training and supervision and conducting research to understand the mental health and psychological needs of individuals referred to Prevent in order to support the development of robust referral pathways between Channel and mental health services. The outcomes of the service review are due to be published next month (w/c 09/11/2020) and will inform the contract tendering process due for this service in the next 6 months).

Based on the outcomes of this work, it was concluded in consultation with other health providers, Police and the Office of Security and Counter Terrorism at the Home Office that the existing service structures were insufficient and that a bespoke evidence based service was required to meet the specific needs of individuals with mental health needs that had been referred to Prevent.

The outcome from this research study led to the Trust developing a new and evidence based bespoke service called Prevent In-Place. The service model designed and subsequently developed by the Trust for implementation ensured the incorporation of relevant national policy frameworks and best practice in mental health, crisis and urgent care, offender mental health including the NHS England 5 Year Forward View, crisis care concordat, assertive outreach models and linkages to the offender personality disorder pathway and strategy and liaison and diversion service pathways.

It should be noted that the formulation of the Trust's Prevent in Place service model has required expert support and input from the Trust's clinical and non-clinical departments. The aim of Prevent in Place is to identify and ameliorate the varied and complex psychosocial and mental health vulnerabilities of individuals identified by West Midlands Case Management (PCM) and to support the understanding and mitigation of counter terrorist risk; identify unmet mental health needs and improve criminal justice outcomes for individuals; reduce vulnerabilities associated with radicalism and extremism and thus reduce potential risk to individuals and the public and reduce costs through efficient partnership working.

Due to the new and unique nature of the service, there has been a continuous process of service evaluation, research and audit to better understand the needs of both the individuals referred to the service and the complex multiagency systems that support them and to then use these outcomes to further adapt and refine the service delivery model.

The service incorporates knowledge and best practice from pathways across the whole age range, presenting difficulties in various services and settings (community, hospitals, prisons, care systems). The service has also had to develop models of working with individuals that meet the thresholds / criteria for mainstream services.

The overall national objective for this model of care is to safeguard individuals with counter terrorism vulnerabilities. However, there is no single service template for this model of care and as such, there are differences in the operational delivery of the three hubs depending on the locally defined priorities and objectives.

Nationally, there are three hubs called Vulnerability Support Hubs across the country that deliver the Prevent programme of which BSMHFT's Prevent in Place is one. All of these hubs have been commissioned separately and have developed their own service

models. As mentioned previously the service evaluation report of the Trust's model of care is due to be released next month.

The provision of this service is expected to go out to tender in the next 6 months, however, Commissioners have yet to specify how many hubs / contracts they will look to put in place (e.g. one national provider / several local providers), although it is of note that one provider (including those currently delivering one of the current pilot services) could bid for any or all of the contracts.

It is certainly not assured that (all) the current providers will win the contracts”.

Request and response

7. On 26 November 2019, the complainant wrote to the NPCC and requested information in the following terms:

“I understand that in April 2016 a study was launched embedding mental health experts with counter-terrorism police in London, Birmingham and Manchester and that in 2017 this project was rolled out nationwide [<https://uk.reuters.com/article/uk-britainsecurity-mentalhealth/the-battle-for-minds-britain-expands-project-on-mental-health-interrorism-idUKKBN1D718N>].

Please could you provide a copy of:

- a. a copy of the original proposal including the rationale and any terms of reference*
- b. a copy of the project description and framework*
- c. a list of all key personnel including*
- d. a timeline of the project*
- e. a copy of the final report or the latest report draft that was produced*
- f. a copy of any document(s) or correspondence outlining the decision not to publish the study and explaining why*

I would like this information in digital format please”.

8. The NPCC responded on 24 December 2019. It provided some information within the scope of the request (parts (a) – (d)) and said that it did not hold the remainder (parts (e) and (f)); it did not cite any exemptions.

9. On 6 January 2020, the complainant requested an internal review in respect of the response for parts (b) and (e) of the request (as the previous response in respect of part (b) had been a summary, they asked for the source information).
10. Following an internal review, the NPCC wrote to the complainant on 27 February 2020. It revised its position, saying that the information at part (b) was exempt by virtue of section 43 of the FOIA; it maintained that no information was held in respect of part (e).
11. On 1 October 2020, during the Commissioner's investigation, the NPCC again revised its position. Having liaised further with BSMHFT, it disclosed a redacted version of the document at part (b) of the request, the redactions having been overseen by BSMHFT itself. In respect of part (e), it advised that it had conducted further searches and had identified some information, however, it determined that this was exempt from disclosure under section 22(A) of the FOIA.

Scope of the case

12. The complainant initially contacted the Commissioner on 5 March 2020 to complain about the way their request for information had been handled. They believed that the NPCC would hold further information to that already identified and also challenged the citing of section 43(2) of the FOIA.
13. Following the NPCC'S further response to the complainant on 1 October 2020, the Commissioner asked for their views. On 6 October 2020, the complainant asked the Commissioner to consider the application of section 43(2) and the public interest in disclosure. In respect of the citing of section 22(A), they said:

"I understand that the ICO considers it good practice for a public body relying on this exemption to provide a likely publication date for the material and I would like to request this".
14. The Commissioner enquired about the publication date and was advised:

"The information holder has since confirmed the intention to publish the outcome of the research during the week commencing 09 November 2020".
15. On 17 November 2020, the Commissioner queried with the NPCC whether the publication had taken place. On 19 November 2020, she

was advised that it was now available online². The complainant was advised accordingly and initially withdrew their complaint in respect of this part of the request. However, they subsequently noted that some appendices that they considered were intrinsic to the report had not been published and they asked the Commissioner to consider the disclosure of these.

16. The Commissioner will consider the application of section 43(2) to part (b) of the request and 22(A) to the appendices falling within part (e) of the request.
17. The complainant has confirmed that they are happy for any staff names to be withheld and so these are not further considered in this notice. However, within appendices A and E, the Commissioner has noticed that the NPCC has noted 'section 40', the exemption for personal information, next to a small amount of text, albeit there is no associated rationale for this application. Similarly, 'section 31', the exemption for law enforcement, has been noted next to a small amount of text in appendix A, albeit there is, again, no associated rationale for its application. The Commissioner will also consider these below.
18. The Commissioner has viewed the withheld information.

Reasons for decision

Miscellanea

19. A small amount of the information, withheld under section 43(2), was specifically queried by the Commissioner. In response, the NPCC advised:

"Following discussions with BSMHFT, we agree that:

the redaction on page 1 and on page 13 should be removed (and are therefore suitable for disclosure)".

20. At the time of writing, this information has not been disclosed and the NPCC is therefore required to take the action set out in paragraph 3, above.

² <https://cdn.prgloo.com/media/59f14741cd39451b960f4eb6eb604bb0.pdf>

Section 22A – research

21. The matter for the Commissioner to consider here is whether or not the appendices, which are referred to in the published report, should be disclosed.

22. Section 22A exempts the following information from disclosure:

(1) Information obtained in the course of, or derived from, a programme of research is exempt information if —

(a) the programme is continuing with a view to the publication, by a public authority or any other person, of a report of the research (whether or not including a statement of that information), and

(b) disclosure of the information under this Act before the date of publication would, or would be likely to, prejudice —

(i) the programme,

(ii) the interests of any individual participating in the programme,

(iii) the interests of the authority which holds the information, or

(iv) the interests of the authority mentioned in paragraph (a) (if it is a different authority from that which holds the information).

23. When asked about the appendices, the NPCC advised the Commissioner:

"I do consider the appendices to be part of the report and captured by the request.

I did think from my discussions with the information holder that they were going to be published, however the main report has been and my understanding is that for the exemption to apply (S22A) there does not have to be any intention to publish the particular information that has been requested".

24. The request asks for "a copy of the final report" which has now been published. However, it is clear from viewing the document online that the report refers to five different appendices, none of which have been published with the report.

25. In the Commissioner's view, which is also reflected by the NPCC above, the appendices are clearly caught within the wording of the request, as they are directly referred to within the published information and sit alongside it to complete the body of work. The final report has been made available but the appendices have not been published alongside that report. There was therefore either an intention to publish them which for some reason has not happened, or there was no intention to publish them at all.

26. According to her guidance on the application of section 22(A)³, the exemption cannot apply post publication:

"Once the research programme has ended and all the planned reports have been published, the exemption in section 22A will no longer apply to any of the information".

27. If there was no intention to publish them, then the appendices could not have been covered by the exemption at section 22(A). If there was an intention to publish them, then this has clearly not occurred. In either case, the appendices are not caught under the exemption at section 22(A) and no alternative exemption has been cited.
28. In the absence of a valid exemption, the appendices should be disclosed, as directed in paragraph 3, above.

Section 31 – law enforcement

29. This exemption has been cited next to a small amount of text in appendix A. No rationale for its application has been provided.
30. Section 31(1) of the FOIA states that:

"Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice-

- (a) the prevention or detection of crime,*
- (b) the apprehension or prosecution of offenders,*
- (c) the administration of justice,*
- (d) the assessment or collection of any tax or duty or of any imposition of a similar nature,*
- (e) the operation of the immigration controls,*
- (f) the maintenance of security and good order in prisons or in other institutions where persons are lawfully detained,*
- (g) the exercise by any public authority of its functions for any of the purposes specified in subsection (2),*

³ <https://ico.org.uk/media/for-organisations/documents/1172/information-intended-for-future-publication-and-research-information-sections-22-and-22a-foi.pdf>

- (h) any civil proceedings which are brought by or on behalf of a public authority and arise out of an investigation conducted, for any of the purposes specified in subsection (2), by or on behalf of the authority by virtue of Her Majesty's prerogative or by virtue of powers conferred by or under an enactment, or*
- (i) any inquiry held under the Inquiries into Fatal Accidents and Sudden Deaths etc. (Scotland) Act 2016 to the extent that the inquiry arises out of an investigation conducted, for any of the purposes specified in subsection (2), by or on behalf of the authority by virtue of Her Majesty's prerogative or by virtue of powers conferred by or under an enactment".*

31. Section 31 is a prejudice based exemption and is subject to the public interest test. This means that not only does the information have to prejudice one of the purposes listed, but also that it can only be withheld if the public interest in the maintenance of the exemption outweighs the public interest in disclosure.
32. In order for section 31 to be engaged, the following criteria must be met:
- the actual harm which the public authority claims would, or would be likely to, occur if the withheld information was disclosed has to relate to the applicable interests within the relevant exemption;
 - the public authority must be able to demonstrate that some causal relationship exists between the potential disclosure of the information being withheld and the prejudice which the exemption is designed to protect. Furthermore, the resultant prejudice which is alleged must be real, actual or of substance; and,
 - it is necessary to establish whether the level of likelihood of prejudice being relied upon by the public authority is met – ie disclosure 'would be likely' to result in prejudice or disclosure 'would' result in prejudice.
33. The first point for the Commissioner to consider is whether any arguments provided by the NPCC relate to the relevant applicable interests where section 31(1) has been cited. However, the NPCC has not submitted any specific arguments in relation to any subsection of 31(1) and this point is not clear from simply viewing the withheld information.
34. It is not for the Commissioner to construct arguments on behalf of the NPCC – the responsibility lies with the public authority.

The Commissioner's conclusion

35. In the absence of any specific section 31(1) rationale having been provided by the NPCC, the Commissioner has necessarily found that section 31(1) is not engaged.

Section 40 – personal information

36. As stated above, the NPCC has not actually relied on section 40 and has not provided any related arguments in support of its application. However, within the appendices, there are comments added by the NPCC which refer to personal information and where it would appear they had intended to rely on section 40.
37. Staff names have been scoped out of the investigation, as agreed by the complainant, so the Commissioner will only consider the small number of remaining redactions.
38. Section 40(2) of the FOIA provides that information is exempt from disclosure if it is the personal data of an individual other than the requester and where one of the conditions listed in section 40(3A)(3B) or 40(4A) is satisfied.
39. In this case, the relevant condition is contained in section 40(3A)(a). This applies where the disclosure of the information to any member of the public would contravene any of the Data Protection principles relating to the processing of personal data ('the DP principles'), as set out in Article 5 of the General Data Protection Regulation ('GDPR').
40. The first step for the Commissioner is to determine whether the withheld information constitutes personal data as defined by the Data Protection Act 2018 ('DPA'). If it is not personal data then section 40 of the FOIA cannot apply.
41. Secondly, and only if the Commissioner is satisfied that the requested information is personal data, she must establish whether disclosure of that data would breach any of the DP principles.

Is the information personal data?

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

“any information relating to an identified or identifiable living individual”.

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

44. An identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.
45. Information will relate to a person if it is about them, linked to them, has biographical significance for them, is used to inform decisions affecting them or has them as its main focus.
46. The Commissioner has examined each instance where section 40 has been cited within the two appendices. She considers that the information which was highlighted by the NPCC does not constitute personal data – there is insufficient detail to allow for identification of any of the parties concerned. Whilst one of the case studies in appendix A does name two politicians, they are not the focus of the data and it does not say anything about them personally other than their names.

The Commissioner's conclusion

47. The Commissioner does not agree that the highlighted information within appendices A and E constitute 'personal data'. Therefore, she has ordered their disclosure, as set out in paragraph 3, above.

Section 43 – commercial interests

48. This exemption has been applied to a document captured by part (b) of the request entitled "*Prevent In-Place Operational Guidelines (Revised October 2017)*". During the Commissioner's investigation, some of this was disclosed to the complainant, following consultation with BSMHFT, but the remainder was withheld under section 43(2).
49. Section 43(2) of the FOIA states:

"Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it)".

Is section 43(2) engaged?

50. In order for section 43 to be engaged, the following criteria must be met:
 - the actual harm which the public authority alleges would, or would be likely to, occur if the withheld information was disclosed has to relate to the applicable interests within the exemption (ie be prejudicial to the commercial activities of any person – an individual, a company, the public authority itself or any other legal entity);

- the public authority must be able to demonstrate that some causal relationship exists between the potential disclosure of the information being withheld and the prejudice which the exemption is designed to protect. Furthermore, the resultant prejudice which is alleged must be real, actual or of substance; and,
 - it is necessary to establish whether the level of likelihood of prejudice being relied upon by the public authority is met – ie that disclosure '*would be likely*' to result in prejudice or that disclosure '*would*' result in prejudice.
51. The first point for the Commissioner to consider is whether the arguments provided by the NPCC relate to the relevant applicable interests.
52. The term '*commercial interests*' is not defined in the FOIA. However, the Commissioner's guidance on the application of section 43⁴ of the FOIA explains that a commercial interest relates to a person's ability to participate competitively in a commercial activity, such as the purchase and sale of goods or services. Their underlying aim may be to make a profit, however, it could also be to cover costs or to simply remain solvent.
53. The Commissioner considers that in order for the exemption to be engaged it must be shown that the disclosure of specific information will result in specific prejudice to one of the parties. In demonstrating prejudice, an explicit link needs to be made between specific elements of the withheld information and the specific prejudice which disclosure of these elements would cause.
54. The NPCC had previously advised the complainant that it had contacted BSMHFT, as the authors of the relevant document. BSMHFT had advised that there was 'commercial sensitivity' with its release, as it related to a contract which would be going out for tender imminently and, because it goes into detail about the structure and delivery methods of its proposed service, releasing it at this time would prevent a fair bidding process.
55. The Commissioner asked the NPCC to provide full arguments setting out why it considered that the exemption to be engaged. She explained that its submissions should identify whose commercial interests it believed

⁴ <https://ico.org.uk/media/for-organisations/documents/1178/commercialinterestssection43-foia-guidance.pdf>

would, or would be likely to, be prejudiced in the event of disclosure, and details of the nature of the prejudice itself. She also asked it to provide evidence that any arguments relating to the third party's interests were a genuine reflection of concerns known to be held by that party.

56. The NPCC advised the Commissioner:

"The 'Prevent in Place Operational Guidelines' document outlines the service model developed by BSMHFT to deliver a 'Prevent' Vulnerability Support Hub. ... this has been developed, evaluated and refined over the course of their research project. This service model will be used by BSMHFT as the basis of a bid for a service contract that is expected to go out for tender in the next 6 months".

57. The NPCC also provided the Commissioner with the following to explain and support its position:

"There is no directly equivalent service nationally, which is why the bespoke service model and staffing elements included in the operational guidelines are commercially sensitive and would likely prejudice BSMHFT from being able to tender competitively when the contract for Prevent is due.

... The [remaining withheld information] has been restricted to information that describes the BSMHFT service model, including the staffing matrix and letter / assessment templates which have all been created internally by BSMHFT, which if accessed by a competitor could provide them with a potentially unfair advantage.

BSMHFT have stated 'We have also identified that we hold a more up to date set of operational guidelines than those held by the NPCC. We would like to extend again an invitation for the requester to contact us directly to enable the Trust to facilitate the request and work alongside the requester to ensure they receive appropriate information that will support their understanding of this very important service'".

58. The NPCC also confirmed:

"The 'Prevent in Place Operational Guidelines' document outlines the service model developed by BSMHFT to deliver a 'Prevent' Vulnerability Support Hub. As outlined within the NPCC response letter, this has been developed, evaluated and refined over the course of their research project. This service model will be used by BSMHFT as the basis of a bid for a service contract that is expected to go out for tender in the next 6 months. It is the NPCC position

that disclosure of the withheld information would prejudice BSMHFT's ability to participate competitively in this commercial process. The specific prejudice being that the withheld Section 43 information could be used by a competitor to formulate a proposal without having to invest the necessary time, expertise and cost to develop their product, giving them an unfair competitive advantage".

59. The Commissioner is satisfied that the NPC has evidenced that the withheld information relates to the appropriate applicable interest. Furthermore, having considered the arguments, together with the withheld information, the Commissioner is satisfied that the NPCC has demonstrated that a causal relationship exists between disclosure of the information and prejudice to BSMHFT's commercial interests. Therefore, the Commissioner considers that the second criterion has also been met.
60. The NPCC did not stipulate the level of likelihood that it is relying on and so the Commissioner has consider the lower level of 'would be likely to' prejudice.
61. Having viewed the withheld information and considered the arguments made, it is clear that disclosing the withheld information could result in competitors having access to sensitive commercial information. This could be used as the basis for a bid in the next tender for the same project. The Commissioner is of the view that it would not be fair to disclose information that would disadvantage BSMHFT in that tender process. She therefore accepts that to disclose detail of a bespoke solution, which has been worked on prior to an imminent tender for such services, would be likely to prejudice the commercial interests of BSMHFT. On this basis, she finds that section 43(2) of the FOIA is engaged.

Public interest test

62. Having found that the exemption is engaged, the Commissioner has gone on to consider the public interest factors in favour of disclosing the withheld information and of maintaining the exemption. Although the Commissioner has found that the section 43(2) exemption is engaged, the information may still be disclosed if the public interest in disclosing it outweighs the public interest in maintaining the exemption.

Public interest arguments in favour of disclosure

63. The NPCC acknowledged that there is a public interest in disclosing information relating to the expenditure of public money.
64. The Commissioner also notes the public interest in transparency and the general public interest in the subject matter of the request.

Public interest arguments in favour of maintaining the exemption

65. The NPCC has argued:

"We consider that if this information was disclosed it would likely prejudice the ability of services to compete fairly in the market as it would give competitors an advantage in future tenders".

The Commissioner's conclusion

66. The Commissioner has considered the public interest arguments both in favour of disclosure and of maintaining the section 43(2) exemption. She notes the importance of transparency and accountability with regard to the expenditure of public money - in this case, funding for the pilot and research having been provided by national counter terrorism policing, the NHS and the Home Office.
67. However, it is clear from the information that has already been disclosed that BSMHFT has expended some considerable time and effort working on the project, devising a suitable methodology for providing related mental health services. She considers that the public interest in BSMHFT being able to tender for this service, in what may well be a competitive field, without fear of early disclosure of its work to its competitors prior to going to tender, outweighs the public interest in the disclosure of the remaining information. It is noted that partial disclosure has been made and that only information which relates to the BSMHFT service model, staffing matrix and letter / assessment templates has been withheld. Disclosure of this detail could mean that it loses its competitive edge and may not win the future business.
68. The Commissioner therefore considers that, in all the circumstances of this case, the public interest lies in favour of maintaining the exemption.
69. The NPCC was therefore entitled by section 43(2) of the FOIA to withhold the Prevent In-Place Operational Guidelines.

Right of appeal

70. 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@justice.gov.uk

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

71. 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.

72. 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

Carolyn Howes
Senior Case Officer
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF