

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 27 April 2023

Public Authority: The Crown Estate
Address: 1 St James's Market
London
SW1Y 4AH

Decision (including any steps ordered)

1. The complainant requested information about remuneration and restructuring. The Crown Estate provided some information and withheld information about remuneration of its staff under sections 40(2) (personal information) and 43(2) (commercial information) of the FOIA. During the course of the Commissioner's investigation the Crown Estate provided some additional information but maintained that the remaining information held was exempt under sections 40(2) and 43 of the FOIA.
2. The Commissioner's decision is that the Crown Estate has incorrectly applied section 40(2) and 43 of the FOIA to the withheld information.
3. The Commissioner requires the Crown Estate to take the following steps to ensure compliance with the legislation.
 - Disclose the withheld information - namely remuneration details for the 8 members of the GLT, that are not currently published, in £5,000 bands.
4. The public authority must take these steps within 35 calendar days of the date of this decision notice. Failure to comply may result in the Commissioner making written certification of this fact to the High Court pursuant to section 54 of the Act and may be dealt with as a contempt of court.

Request and response

5. On 26 July 2022, the complainant wrote to Crown Estate and requested information in the following terms:
 1. "Please could you provide remuneration details for the 11 GLT [Group Leadership Team] members in the same format as the details provided in tables on pages 86 and 87? [of your Annual report]
 2. Please can you provide a list of all salaries, bonuses and other payments made to staff employed at the London office today? Clearly I am not expecting names or job titles or any other personal data, just a list of the salaries and other payments were made – one line per staff member – showing their full-time equivalency.
 3. Please can you provide the aims of the restructuring and its cost and whether those aims have been realised. I am relying on you providing some advice and assistance to tell me how this information is held to help me frame my request. It may be that there was a project set up to manage this restructuring, and that all the information I need is contained in the project brief, progress reports to management and closure report. if they exist, please provide them. Again, I do not want personal details of those affected, just the information I need to further understand the justification for making expensive redundancies while the headcount and salary costs increased".
6. The Crown Estate responded on 14 September 2022 and provided some information but withheld information relating to parts 1 and 2 of the request under sections 40(2) and 43 of the FOIA.
7. On 15 September 2022 the complainant requested an internal review into the handling of parts 1 and 2 of the request.
8. The Crown Estate provided the outcome of its internal review on 10 December 2022 and upheld its decision that sections 40(2) and 43 applied to parts 1 and 2 of the request.

Scope of the case

9. The complainant contacted the Commissioner on 9 January 2023 to complain about the way their request for information had been handled.
10. During the course of the Commissioner's investigation, the Crown Estate disclosed details of pay bands, the number of staff in each pay band and the average bonus payments made to staff within each pay band for the

financial year 2021/22. This table included all staff in its London office and the GLT. However, the Crown Estate maintained that information relating to part 1 of the request ie more detailed remuneration information for each its GLT members was exempt under sections 40(2) and 43.

11. The scope of the Commissioner's investigation is to determine whether the Crown Estate correctly applied sections 40(2) and 43 to part 1 of the request.

Reasons for decision

Section 40 – personal information

12. Section 40(2) provides an exemption for information that is the personal data of an individual other than the requester and where the disclosure of that personal data would be in breach of any of the data protection principles.
13. Section 3(2) of the Data Protection Act 2018 (the DPA) defines personal data as:

"any information relating to an identified or identifiable living individual."
10.
14. The two main elements of personal data are that the information must relate to a living person and that the person must be identifiable.
15. The withheld information in this case comprises remuneration details including details of bonuses and pensions for the Crown Estate's GLT. There are 11 individuals within this team, 3 of whom are also members of the Crown Estate's Value Creation Committee (VCC). The VCC comprises of the Chief Executive Officer, the Chief Financial Officer and the Executive Director, Purpose, Sustainability & Stakeholder. Remuneration details for the VCC are published in the Crown Estate Annual report. As such, the withheld information comprises the remuneration details for the other 8 member of the GLT.
16. In this case the Commissioner is satisfied that, as the withheld information is salary and remuneration details for each member of the GLT¹, the information constitutes the personal data of the individuals concerned.

¹ <https://www.thecrownestate.co.uk/our-leadership/>

17. The next step is to consider whether disclosure of this personal data would be in breach of any of the data protection principles. The Commissioner has focussed here on principle (a), which states:

“Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.”

18. In the case of an FOIA request, the personal data is processed when it is disclosed in response to the request. This means that the information can only be disclosed if to do so would be lawful, fair and transparent.
19. When considering whether the disclosure of personal information would be lawful, the Commissioner must consider whether there is a legitimate interest in disclosing the information, whether disclosure of the information is necessary, and whether these interests override the rights and freedoms of the individuals whose personal information it is.

Legitimate interests

20. The complainant considers that there is a legitimate interest in understanding the remuneration profile and cost of Crown estate employees.
21. The Crown Estate accepts that there is a broad legitimate interest in disclosure of this type of information “in line with the premise that taxpayers will have a natural, and legitimate interest in knowing how a publicly funded organisation allocates its funding”.
22. The Commissioner considers that disclosure in this case would serve a legitimate interest in that it would serve the general principles of transparency and accountability. More particularly, disclosure would allow for more scrutiny of the salaries of senior staff working in the Crown Estate.

Is disclosure necessary?

23. “Necessary” means more than desirable but less than indispensable or absolute necessity. Accordingly, the test is one of reasonable necessity and involves consideration of alternative measures which may make disclosure of the requested information unnecessary. Disclosure under the FOIA must therefore be the least intrusive means of achieving the legitimate aim in question.
24. The Commissioner considers that the complainant is pursuing a legitimate interest. Whilst the Commissioner notes the information which the Crown Estate already publishes in relation to salaries and remuneration, he is not aware that the information requested (ie remuneration information for each of the remaining 8 members of the GLT) has otherwise been published or can otherwise be accessed by the

complainant. The Commissioner is therefore satisfied that disclosure under the FOIA would be necessary to meet the legitimate interests identified.

25. As the Commissioner has decided in this case that disclosure is necessary to meet the legitimate interest in disclosure, he has gone on to conduct the balancing test.

Balance between legitimate interests and the data subject's interests or fundamental rights and freedoms

26. It is necessary to balance the legitimate interests in disclosure against the data subject's interests or fundamental rights and freedoms. In doing so, it is necessary to consider the impact of disclosure. For example, if the data subject would not reasonably expect that the information would be disclosed to the public under the FOIA in response to the request, or if such disclosure would cause unjustified harm, their interests or rights are likely to override legitimate interests in disclosure.

27. In considering this balancing test, the Commissioner has taken into account the following factors:

- the potential harm or distress that disclosure may cause;
- whether the information is already in the public domain;
- whether the information is already known to some individuals;
- whether the individual expressed concern about the disclosure; and
- the reasonable expectations of the individuals.

The Crown Estate's position

28. The Crown Estate explained that its contracts with employees are individually negotiated and do not contain any information to advise employees that their personal data, including salary information, would be shared with the world at large. The Crown Estate considers that salary information relates to "employees as individuals and to their personal circumstances and is treated as personal data". All internal communications relating to salary information is marked as 'personal' and treated as private.

29. Whilst employees are aware of FOIA obligations generally, the Crown Estate contends that it is only members of the VCC and the Board who would have a reasonable expectation that information relating to their salaries would be published. In light of this the Crown Estate considers that disclosure of information relating to the 8 GLT members would be

unfair as it would represent an infringement of their rights and freedoms as data subjects.

30. As background information the Crown Estate pointed out that it is "unique as a public body, with no equivalent..... It operates as an independent commercial business, established by the Crown Estate Act 1961. Due to its diverse operations, which include the wind energy sector, commercial real estate and the stewardship of environmental and ecological sites, employees are more likely to be drawn from the private sector rather than via traditional public sector or civil service backgrounds". In light of this, the Crown estate contends that it would not be possible to compare the pay of the 8 GLT members against the pay of equivalent individuals in the public sector. This is because its competitors are private companies who do not publish details of salaries of their employees.
31. The Crown Estate considers that information about an individual's remuneration relates to both their private and public life. Whilst they received the remuneration for undertaking a public role, the information also relates to their private financial situation. The Crown Estate contends that, as the information has been requested in relatively narrow bands of £5,000, disclosure would come close to publishing exact salary details, and in turn the private financial standing of the individuals in question. In addition, as the request includes bonus information, judgements about an individual's performance could be inferred from disclosure. In the Crown Estate's opinion this would represent a further infringement of privacy. The Crown Estate also considers that disclosure would weaken the ability of the individuals to negotiate salaries with any future employers.
32. The Crown Estate considers that the information it already publishes on its website, which has been provided to the complainant, is sufficient to meet the legitimate interest identified. It confirmed that it had provided the complainant with:
 - the amount by which its total pay bill for London employees increased in the period in question,
 - the total amount spent on bonuses, and
 - information on salaries by payband and average bonus payments for London employees including the GLT (information which was disclosed during the Commissioner's investigation).
33. The Crown Estate also confirmed that it published remuneration details for all Board members, counsellors and members of the VCC in its annual report. In addition, Crown Estate also publishes the following information in its annual report which it considers to be sufficient to meet any legitimate interest in transparency and accountability :

- information on the gender pay gap (page 31 of the latest report);
 - pay ratios published comparing the CEO pay to 25th/50th/75th percentile (page 84);
 - the full remuneration range for employees (page 84); and
 - total employee costs and information on the number of employees, as well as reorganisation and early retirement costs (page 112).
34. The Crown Estate confirmed that, as part of its recruitment process, it does not publish salary details. In addition, the Crown Estate is not subject to widely-known salary bands such as those within the Civil Service.

The complainant's position

35. The complainant pointed out that page 65 of the annual report 2021/22² clearly shows that the GLT are responsible for day to day business operations, including considering strategy, business plans, the provision of overall group leadership and a quarterly review of business activity. In addition, page 90 of the annual report sets out that the GLT leads on strategy, business plans, enterprise priorities, risk analysis and the oversight of operational performance.
36. The complainant also referred to the Commissioner's Model Publication Scheme definition documents for non-departmental public bodies³ and wholly owned companies⁴ which indicate, under "How we make decisions" that the Commissioner would expect these public authorities to publish minutes of senior level meetings, reports and papers. The complainant stated that the Crown Estate does not publish any records from its board, committee or other senior level meetings.
37. The complainant also referred to the "what we spend and how we spend it section" of the definition documents which also indicate that the Commissioner expects authorities to publish, as a minimum, senior staff salaries in bands of £5000.
38. The complainant explained that the Crown Estate used to publish salary information of individuals working in the roles which now form the GLT. From 2007 to 2016 the annual reports included information on salaries

² https://www.thecrownestate.co.uk/media/4123/the-crown-estate_annual-report_2021-22.pdf

³ <https://ico.org.uk/media/for-organisations/documents/definition-documents-2021/4018887/dd-non-departmental-public-bodies-20211029.pdf>

⁴ <https://ico.org.uk/media/for-organisations/documents/definition-documents-2021/4018898/dd-wholly-owned-companies-20211029.pdf>

and bonuses for both its Board and its 'Management Board'. The complainant considers that the Management Board had a similar remit to the GLT and its membership was made up of similar officers. For example, the heads of the Marine, Rural (now Windsor and Rural) and Urban (now London and Regional) portfolios were all members of the former Management Board. The former Management Board also included directors of operations and corporate affairs, which are positions which are again mirrored in the GLT, albeit they are now known as Executive Directors and/or Managing Directors.

39. In relation to the complainant's point regarding previous salary information that was published in its annual reports, the Crown Estate explained that it used to publish remuneration information of its Management Board, and this is what the complainant has referred to. However, the Management Board ceased to operate with effect from 31 March 2016. It was reconstituted into a smaller executive committee – the VCC – comprising 2 to 3 people. The Crown Estate explained that it is the VCC that has overall responsibility for all major investment and disinvestment decision making. As such, salary information of the VCC and the Board is now published in its annual reports.
40. The Crown Estate accepts that the Commissioner's guidance in relation to the Model Publication Scheme sets out that he expects government departments to publish details of senior salaries in bands of £5,000. The Crown Estate contends that it does this in its annual report, setting its own definition of senior employees, ie members of the Board and the VCC. The Crown Estate also pointed out that, as it operates as an independent commercial business, established by the Crown Estate Act 1961, its employees are not part of the Civil Service.

The Commissioner's conclusion

41. In the Commissioner's view, a key issue is whether the individual concerned has a reasonable expectation that their information will not be disclosed. These expectations can be shaped by factors such as an individual's general expectation of privacy, whether the information relates to an employee in their professional role or to them as a private individual, and the purpose for which they provided their personal data.
42. It is also important to consider whether disclosure would be likely to result in unwarranted damage or distress to that individual.
43. Disclosure under the FOIA is tantamount to publication to the world at large. The Commissioner must therefore balance the legitimate interests with the data subject's interests when determining whether the information can be disclosed into the public domain and not just to the complainant.

44. The Commissioner considers that employees of public authorities should reasonably expect some information about their salaries to be made available to the public. The Commissioner accepts that the Crown Estate may be a unique public body as it operates as an independent commercial business. He also notes the Crown Estate's arguments that its employees are more likely to be drawn from the private sector. However, the Commissioner considers other public authorities are also likely to recruit at least some specialised posts from the private sector. In addition, whilst the Crown Estate may not be funded from the public purse the Commissioner understands that any surplus from the Crown Estate's activities is passed back to the Treasury. As such, efficient operation of the Crown Estate, including the management of the monies it spends on staff salaries has a direct impact on the public purse.
45. While the Commissioner accepts that the VCC now has overall responsibility for decision making within the Crown Estate, the individuals who are the subject of the request occupy the next most senior roles in the organisation. He also notes that up until 2016 remuneration information about the roles that the individuals occupy were published in annual reports. The Commissioner considers that this historic practice would have informed the expectations of the individuals in respect of disclosure of information about their remuneration.
46. The Crown Estate has argued that salaries are individually negotiated and has suggested that disclosure of the figures in £5,000 bands would be little different from releasing the exact figure". The Commissioner's Guidance accepts that, "in some cases, releasing the exact salary would be significantly more intrusive than approximate salaries, for example because: the exact salary is individually negotiated rather than determined according to a known formula". Whilst the Commissioner accepts that it may not be appropriate to release exact salaries under these circumstances he does not consider that this is a bar to releasing banded salaries to the nearest £5000, nor does he accept that releasing banded salaries would be little different from releasing the exact salaries.
47. The Commissioner is mindful of a previous decision notice published in March 2008 under reference FS50070465. In this case the Commissioner determined that the BBC should disclose the salary band of the Controller of Continuing Drama, but not his exact salary, which was individually negotiated. He found that the legitimate public interest outweighed the intrusion of disclosing the salary band but not the additional intrusion of disclosing an exact salary.
48. The Crown Estate has not produced any evidence to demonstrate that it has approached any of the senior staff referred to in the request to see whether they had any objection to the disclosure of information relating

to their remuneration or indeed whether they believed that any such disclosure would cause them any distress or harm.

49. Having considered the Crown Estate's representations, the Commissioner has not been persuaded by its arguments that disclosure would compromise the rights and freedoms of the individuals concerned. The Commissioner does not consider that the Crown Estate has provided any convincing or extenuating circumstances that would lead to the individuals concerned being distressed, should the information be disclosed. There is a significant difference in the strength of arguments for non-disclosure between information relating to an individual's public life and their private life. Pay banding specifically relates to an individual's public life and their work role.
50. The Commissioner also makes the further point that, as set out in his guidance, in recent years public authorities are publishing increased information relating to salaries of public sector officials. "Government departments and other public bodies now routinely publish the names, job titles and salaries of senior civil servants on www.data.gov.uk, as part of the government's policy on open data and transparency. Salaries are given in bands of £5,000 (eg £120,000 to £124,999). For more junior posts the job title and pay scales are shown"
51. The Commissioner acknowledges that the Crown Estate already publishes some detailed information about senior staff salaries, although this is now limited to its Board and the VCC in salary bands of £5,000.
52. The Commissioner considers that there is a significant legitimate interest in transparency and accountability in respect of information which would allow the public to scrutinise the way in which the Crown Estate allocates funds, particularly in relation to the salaries of its senior employees.
53. Having taken into account all the circumstances of this case, and having considered the reasonable expectations of the individuals concerned and the potential consequences of disclosure, the Commissioner is satisfied that there is sufficient legitimate interest in disclosure of the information requested in this case to outweigh the data subjects' fundamental rights and freedoms. There is therefore an Article 6 basis for processing this personal data and it would thus be lawful.
54. Even though it has been demonstrated that disclosure of the requested information under the FOIA would be lawful, it is still necessary to show that disclosure would be fair and transparent under the principle (a).
55. In relation to fairness, the Commissioner considers that if the disclosure passes the legitimate interest test for lawful processing, it is highly likely that disclosure will be fair for the same reasons.

56. The requirement for transparency is met because as a public authority, the Crown Estate is subject to the FOIA.
57. The Commissioner has therefore determined that the Crown Estate was not correct to apply section 40(2) to the request.
58. As the Crown Estate has also applied section 43(2) to the withheld information the Commissioner has gone on to consider its application of this exemption.

Section 43 – commercial interests

59. Section 43(2) of FOIA states that

“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).”

60. The exemption can be engaged on the basis that disclosing the information either “would” prejudice commercial interests, or the lower threshold that disclosure only “would be likely” to prejudice those interests. For the Commissioner to be convinced that prejudice “would” occur, he must be satisfied that there is a greater chance of the prejudice occurring than not occurring. To meet the threshold of “would be likely to” occur, a public authority does not need to demonstrate that the chance of prejudice occurring is greater than 50%, but it must be more than a remote or hypothetical possibility.
61. In order for a prejudice based exemption, such as section 43, to be engaged the Commissioner believes that three criteria must be met:
 - Firstly, 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 relevant exemption;
 - Secondly, 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 should be real, actual or of substance; and
 - Thirdly, 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 or ‘would’ result in prejudice. In relation to the lower threshold, the Commissioner considers that the chance of prejudice occurring must be a real and significant risk. With regard to the higher

threshold, in the Commissioner's view this places a stronger evidential burden on the public authority. The anticipated prejudice must be more likely than not.

The Crown Estate's position

62. In this case the Crown Estate is relying on the lower threshold of prejudice, ie that disclosure of the withheld information (renumeration information for 8 members of the GLT) would be likely to cause prejudice. The Crown Estate considers that disclosure would be likely to prejudice commercial interests in three main ways:

- "Cause detriment to The Crown Estate in terms of difficulty in retaining high calibre personnel in the future as this level of disclosure would leave it vulnerable to employees being poached more easily by competitors;
- prevent The Crown Estate from attracting and retaining high calibre employees because it operates in the context of a competitive private sector market in which individuals have limited expectations of detailed salary information being disclosed to the world at large;
- weaken the future negotiating position of individuals who have worked at The Crown Estate when applying to other jobs, particularly where an individual belongs to an under-represented group, because publication of their current or prior salary could reduce their ability to negotiate a commercially competitive salary externally".

63. In relation to the retention of personnel, the Crown Estate referred to a media article in September 2022⁵ concerning staff at the BBC leaving and one of the reasons cited was the publication of the salaries of top stars. The article explains the risks associated with commercial competitors of the BBC knowing "where to pitch their offer". The Crown Estate pointed out that it operates in a similar environment to the BBC as it competes against private enterprises to recruit staff.

64. The Crown Estate also raised concerns about the expectations of the individuals concerned in relation to publication of their remuneration, and the duty of care that it owes to its employees in respect of such information. The Crown Estate argues that disclosure would be likely to lead to the individuals concerned feeling "exposed in a way that they would not if operating in an equivalent role in the private sector, and

⁵ <https://www.bbc.co.uk/news/entertainment-arts-62723769>

that their privacy rights have not been protected in an equivalent way". This effect would be likely to lead to mistrust in the Crown Estate as an employer, and could in turn lead to individuals seeking employment with other organisation where they would not be put at risk in respect of disclosure of their personal data. This would jeopardise the talent pool from which the Crown Estate would be able to recruit from, which would in turn "have corollary negative effects on its performance and thus commercial interests".

65. In relation to the commercial interests of the GLT members, the Crown Estate considers that disclosure would be likely to weaken their negotiating positions in the future. It considers that some individuals will accept a lower salary for the unique opportunity of working at the Crown Estate. However if the withheld information was disclosed it could weaken their bargaining position should they choose to seek future employment in the private sector, as negotiations would be hampered through disclosure of their published salary "which may not equate to their real worth in the wider industry". The Crown Estate considers that this is particularly important where an individual belongs to a minority group who may already face prejudice on that basis.

The Commissioner's conclusion

66. The term 'commercial interests' is not defined in the FOIA; however, the Commissioner has considered his guidance on the application of section 43⁶, which clarifies that:

"A commercial interest relates to a legal person's ability to participate competitively in a commercial activity. The underlying aim will usually be to make a profit. However, it could also be to cover costs or to simply remain solvent."

67. The information withheld in this case is remuneration information for a number of senior posts. The Commissioner has previously found, in decision notice FS50713237⁷, that such information, relating as it does to a public authority's ability to attract suitable staff to deliver its business objectives, relates to a commercial interest.

68. In relation to the Crown Estate's first argument around retention of staff, outlined in paragraph 62, whilst the Commissioner has read the media article referred to in relation to BBC presenters leaving. The media article refers to presenters who have left "by force or by choice",

⁶ <https://ico.org.uk/for-organisations/foi-guidance/section-43-commercial-interests/>

⁷ <https://ico.org.uk/media/action-weve-taken/decision-notices/2018/2259439/fs50713237.pdf>

the fact that the reasons for each presenter leaving will be unique to the individual and the fact that there are a number of reasons why people are deciding to leave. The Commissioner notes that the fear of salary information being published was cited as only one possible reason why presenters were choosing to leave the BBC. The article also refers to other reasons for presenters leaving including BBC reorganisation, the need to reduce costs, a drive to move more staff out of London, the BBC's "interpretation of regulation regarding impartiality prevents it from telling viewers and voters the truth", and presenters who are forced to leave. In light of this the Commissioner is not satisfied that disclosure of salary information is directly responsible for staff choosing to leave the BBC.

69. In relation to the Crown Estate's second argument, the Commissioner has already considered this issue in paragraphs 44, 45 and 50 above in his assessment of section 40(2). He concluded that the individuals concerned would reasonably expect a level of information concerning their salaries to be disclosed.
70. Finally, the Commissioner has considered the Crown Estate's third argument - that disclosure would weaken the individuals' negotiating position with any future employers. The Commissioner considers that it is widely known that, generally speaking, public sector salaries are lower than those paid for similar roles in the private sector. The Crown Estate itself has acknowledged this in its representations. As such, the Commissioner is not satisfied that this is a convincing argument against disclosure.
71. The Commissioner has considered the Crown Estate's arguments on the application of section 43(2), and specifically the claimed prejudice. The Commissioner is not convinced that disclosure of the information would cause the claimed prejudice. Whilst the Commissioner appreciates that the Crown Estate may be more likely to recruit individuals from the private sector, he does not consider that the Crown Estate has sufficiently evidenced that there would be a causal affect between disclosure of the withheld information and its ability to recruit and retain staff and fulfil its purpose any more than other public authorities. In addition, the Commissioner also notes that the Crown Estate has previously published remuneration for these equivalent posts and he has not been provided with any evidence that these previous disclosures had the same effects that the Crown Estate is now claiming would be likely to occur if the information was disclosed.

Having considered the above, the Commissioner has concluded that the Crown Estate has not demonstrated the exemption is engaged. As the exemption is not engaged, the Commissioner does not need to proceed further and consider the public interest test.

Right of appeal

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

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

Tel: 0203 936 8963

Fax: 0870 739 5836

Email: grc@justice.gov.uk

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

73. 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.

74. 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

Joanne Edwards
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