

## **Freedom of Information Act 2000 (FOIA)**

### **Decision notice**

**Date:** 27 June 2018

**Public Authority:** Financial Conduct Authority  
**Address:** 25 The North Colonnade  
Canary Wharf  
London  
E14 5HS

#### **Decision (including any steps ordered)**

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1. The complainant has requested from the Financial Conduct Authority (FCA) information about Register records, the Approved Persons Scheme and particular costs. FCA released a significant amount of information and withheld some information under section 40(2) of the FOIA (third person personal data) and section 42 (legal professional privilege).
2. The Commissioner's decision is that:
  - With regard to information that is not the complainant's own personal data, on the balance of probabilities the Commissioner is prepared to accept that FCA has released all the information that it holds that falls within the scope of the complainant's requests (that is not exempt information) and has complied with section 1(1) of the FOIA with regard to these requests.
  - FCA has breached section 10(1) of the FOIA as it has not complied with section 1(1) within the 20 days that is a requirement of the Act, with regard to some of the relevant information it holds.
  - FCA breached section 17(1)(b) of the FOIA as it incorrectly withheld information it holds relating to requests 1a) to 1d) under section 42(1). All the information that FCA holds that is relevant

to these requests is the complainant's own personal data. FCA should have applied section 40(1) to the requests (applicant's own personal data) before going on to handle them under the Data Protection Act.

3. The Commissioner does not require FCA to take any steps to ensure compliance with the legislation.

## Request and response

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4. On 17 March 2017 the complainant submitted a series of requests for information to FCA. FCA responded on 10 April 2017. It explained that the FOIA concerns information held in recorded form and asked the complainant to clarify what recorded information he was seeking. On the same day – 10 April 2017 - the complainant submitted what he considered to be clarified requests. Given their length it is reproduced in the Appendix to this notice.
5. FCA wrote to the complainant on 12 April 2017 and again advised that the FOIA concerns only recorded information and does not oblige a public authority to answer general queries, provide explanations to answer questions, or to create information to order to respond to a request. FCA asked the complainant again to clarify what recorded information he was seeking, such as emails, handwritten documents etc. The complainant provided FCA with small amount of additional text to add to request 2b (shown in non-italicised red type in the Appendix).
6. On 7 July 2017, FCA provided a new response (its reference FOI5055) and released information that the complainant had requested, under both the FOIA and the Data Protection Act 1998 (DPA - which was the legislation in force at that point). FCA withheld some information that is the personal data of third persons and withheld other information under section 42 of the FOIA.
7. FCA provided a further response on 4 August 2017. It acknowledged that it had identified further information falling within the scope of the complainant's requests which it released. It re-stated that the complainant's requests cover information that is both his personal data (dealt with under the DPA) and other information (dealt with under the FOIA). To simplify matters FCA said it had provided the complainant with a single response which covered both types of information. FCA noted that a small amount of information had been redacted under sections 40(2) and 42(1).

8. On 9 August 2017 the complainant requested that the FCA review its decision to withhold information under section 42 of the FOIA. He also disputed the completeness of the information FCA had released to him.
9. FCA sent him the outcome of its internal review on 26 September 2017. FCA had considered its application of section 42 and whether it holds any further information falling within the scope of the requests. FCA maintained its reliance on section 42 with regard to the majority of the information it had withheld under this exemption, and confirmed that it considered the public interest favours maintaining this exemption. It released a small amount of information that, on reconsideration, it considered did not attract section 42(1).
10. FCA confirmed that additional information it had subsequently identified had been sent to the complainant on 15 September 2017 and that it holds no further relevant information.
11. In correspondence to the complainant dated 14 November 2017, FCA confirmed that it had searched for particular recorded information regarding telephone calls, had identified information it holds and had sent this to the complainant on a memory stick. The Commissioner understands this to have been the information released on 15 September 2017.

### **Scope of the case**

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12. The complainant contacted the Commissioner on 12 February 2018 to complain about the way his requests for information had been handled. He confirmed that he is dissatisfied with FCA's application of 42(1) to the information it has withheld, he considers that FCA holds further information that it should release to him under the FOIA and was also dissatisfied with the length of time it took for FCA to respond to his requests. The complainant was not concerned about FCA's application of section 40(2) to some information.
13. The Commissioner's investigation has focussed on whether FCA has released to the complainant all the information that falls within the scope of his requests that it is appropriate to release under the FOIA (as opposed to the DPA). She has also considered whether FCA is correct to apply section 42(1) of the FOIA to information it has withheld under this exemption and whether it complied with section 10(1).
14. Some of the information the complainant has requested, and that has been released to him under the DPA, is his own personal data. Such information is exempt from release under the FOIA under section 40(1). The complainant's concern about FCA's handling of his requests for his

own personal data does not fall within the scope of this investigation and the Commissioner has considered that matter separately.

15. During the Commissioner's investigation FCA told her that it had identified a further small amount of information and it released this to the complainant on 26 June 2018. The Commissioner has reviewed this material and she is satisfied that it is also the complainant's own personal data and therefore outside the scope of her investigation.
16. Finally, under 'Other Matters' the Commissioner has considered whether one of the complainant's requests is a valid request as defined under section 8 of the FOIA.

## Reasons for decision

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### Background

17. FCA has explained that the Financial Services Register ('the Register') is a public record that shows details of firms, individuals and other bodies that are, or have been, regulated by the Prudential Regulation Authority and/or the FCA. It also has information on firms regulated by the Financial Services Authority (FSA) that had cancelled or stopped being regulated before April 2013. 'Approved Persons' who perform controlled functions ('CFs') for an authorised firm usually have significant influence over the firm's regulatory conduct. Different controlled functions apply to different businesses, depending on what activities they provide. For example, Directors of firms appear on the Register as CF1 Director Function.
18. FCA has provided the Commissioner with a background to the request. She does not intend to detail the background in this notice, save that it broadly concerns a long running (since 2009) dispute the complainant has with FCA about information about him that is published in FCA's Register.
19. FCA says that various of its departments have attempted to help the complainant over the years. Its Complaints Team has undertaken detailed investigations and the Complaints Commissioner has also considered appeals in 2009, 2010, 2013 and 2017. Following the Complaints Commissioner's decision in 2017 the complainant sought to pursue his grievance about the Register entries further with the FCA. FCA's position is that its Complaints Team has considered the complainant's case as far as it is able to and will not now enter into further correspondence with him on the subject of information that appears on the Register. FCA says that the complainant therefore

requested that his correspondence with the FCA be taken forward under the FOIA.

20. In FCA's view, the complainant's subsequent correspondence contained a mixture of reiteration and statements of fact (reflecting the position as he sees it) together with requests for answers and explanations to questions posed.
21. FCA says that it was necessary for it to explain to the complainant that the FOIA simply provides public access to 'recorded' information held by a public authority (at the time of the request). The Commissioner confirms that the FOIA does not oblige an authority to provide explanations, answer general questions and queries, or to create new information in order to respond to a request.

### **Section 1 – right of access to recorded information held by a public authority**

22. Under section 1(1) of the FOIA anyone who requests information from a public authority is entitled to be told (a) whether the authority holds the information and (b) to have the information communicated to him or her if it is held.
23. The Commissioner has reviewed the complainant's clarified requests. According to the complainant, the elements of his original request in black type are background information, the elements in red type are general questions and the elements in bold, red type concern verbal and written records that the complainant has noted in his request that he wants sight of. The complainant has also confirmed that the timeframe of his request is 2 December 2015 to 10 April 2017.
24. Whether FCA answers the complainant's general questions is a customer service matter for FCA and not one that the Commissioner has considered. As above, it is on the complainant's requests for recorded information (in bold, red type) that the Commissioner has focussed.
25. Requests 1a), 1b), 1c) and 1d) are discussed from paragraph 43. During a discussion with the Commissioner, FCA confirmed that it holds no additional information within the scope of these requests - as they have been framed - that is not the complainant's own personal data. Details of the extensive searches FCA undertook are discussed below and FCA says that it also drew on its corporate knowledge and memory to identify what relevant information FCA might hold and where it might hold it.
26. Requests 2a), 2c) and 2d) are requests for the complainant's own personal data. As such they are exempt from release under the FOIA under section 40(1) and FCA has handled these requests under the DPA.

As noted, the Commissioner has considered the complainant's resulting DPA complaint separately.

27. Request 2b) is discussed in 'Other Matters'.
28. Requests 3a), 3b), 3c) and 3d) broadly concern the costs associated with amending the Register records. During the discussion with the Commissioner, FCA confirmed that it is satisfied that it has released to the complainant all the information it holds that falls within the scope of these four requests, as they have been framed, and that it holds no further relevant information. As above, details of the extensive searches it undertook are discussed below and again, FCA says that it also drew on its corporate knowledge and memory to identify what relevant information FCA might hold and where it might hold it.
29. Request 3e) is a request for the complainant's own personal data which, again, the Commissioner has removed from the scope of her investigation.
30. FCA has confirmed to the Commissioner that it undertook searches for any information it holds that it can release under the FOIA that covered the period from 2 December 2015 to 10 April 2017, when the complainant had clarified his original request.
31. FCA confirmed in its submission to the Commissioner that when it received the complainant's clarified requests it was clear to it that some points related to his own personal data and that the complainant consented to these points being considered under the DPA rather than the FOIA. However, because of the complex way in which the requests are formulated, and following discussions with its legal adviser FCA, decided that, rather than attempt to split the response between the various points raised, it would provide the complainant with **all** the information it held (within scope) unless an exemption to disclosure applied. FCA says its responses dated 7 July 2017 and 4 August 2017 therefore provided all the information it could locate at that time, with some minimal information exempted under sections 40 and 42 of the FOIA and paragraph 10 of schedule 7 to the DPA.
32. In its submission FCA acknowledges that individuals can be disappointed when not as much information exists they expect. It says that it has undertaken numerous searches of the records of relevant business areas, as well as the records of those individuals involved in the complainant's service complaint case. As a result of its searches, 10 lever arch files were located (each containing approximately 500 A4 pages). Of the 10 files many contained duplicate material but FCA says it reviewed this nonetheless to establish its relevance. Other records fell outside the scope of the date range requested. FCA has confirmed that

everything it could locate has been released to the complainant, with the exception of the material it says is exempt from release under section 42(1) (and section 40(2)).

33. FCA has confirmed that it contacted its Authorisation, Contact Centre and Complaints teams which hold a significant volume of information stretching back to 2009 when the complainant initially raised his concern. In addition the complainant was able to provide the names of some staff he had previous dealings with. It was therefore possible to contact those staff members or their teams (some have moved or left the FCA) as part of its searches.
34. Its searches included information contained in databases and Outlook folders for each business area, as any records have not been stored centrally for records management purposes. All individuals involved in the Complaint and Register issues would have saved any emails within their own filing structure and used their own naming conventions appropriate to their areas. FCA says its staff are not permitted to hold FCA information on personal computers.
35. FCA has confirmed that a number of searches were undertaken using a variety of different search terms. Words and phrases used were based on what the relevant business areas believed would be the search terms appropriate to identify relevant information amongst their records.
36. FCA says that in addition, telephone calls to a small number of departments, or received via its Central Switchboard, are recorded for training purposes. FCA therefore arranged for call records to be checked to ascertain if any relevant information is held. (FCA added that transcripts of telephone calls are not created unless a person is hard of hearing.)
37. FCA has told the Commissioner that there is no evidence to suggest that any relevant records have been destroyed or deleted. Its Complaints Teams have advised that records are retained for 25 years following the conclusion of a complaint. Its Authorisations Department also retains records for approved person applications for 25 years.
38. In its submission FCA has discussed the matter of the complainant's telephone calls to it and information relating to telephone calls that it was subsequently able to release to him. The Commissioner understands that this would have been released to the complainant under the DPA and therefore she has not considered this particular matter further.
39. In her discussion with FCA, the Commissioner asked FCA to consider whether it holds information relevant to any of the complainant's

requests that could not be categorised as his personal data – that is, more general information not associated with the complainant's service complaint – that might still be relevant to any of the requests. FCA confirmed that, given the timeframe of the requests, its corporate memory and intelligence and the searches it has carried out, it is as sure as it is reasonable to be in the circumstances that it holds no, more general, information that it has not released.

40. The Commissioner has considered the specifics of the complainant's requests (the focus of which is, for the most part, his own service complaint against FCA), his submissions to her, FCA's submission and the searches it has undertaken, the significant volume of information it has released to the complainant and the explanations it has provided to her in discussion. On the basis of this she is prepared to accept, on the balance of probabilities, that FCA has released to the complainant all the relevant information it holds that falls within the scope of his FOIA requests, and that it holds no further relevant information.

### **Section 10 – time for compliance**

41. Section 10(1) of the FOIA obliges a public authority to comply with section 1(1) promptly and within 20 working days following the date of receipt of a request.
42. In this case the complainant submitted his clarified request on 10 April 2017 and FCA released information to him under the Act on 7 July 2017. FCA therefore breached section 10(1).

### **Section 17 – refusal of request / Section 40 – personal data**

43. Under section 17(1) of the FOIA a public authority that is relying on a Part II exemption to withhold requested information must give the applicant a notice which a) states that fact b) specifies the exemption in question and c) explains why the exemption applies.
44. The Commissioner has reviewed the information that FCA is withholding under section 42(1) of the FOIA. It appears to her that, although it is broadly comprises email correspondence involving FCA's legal team, this information is the complainant's own personal data. As such it is exempt from release under the FOIA under section 40(1) and not section 42(1).
45. The section 40(1) exemption concerns information that is the applicant's own personal data which he or she is unlikely to want to be released to the world at large under the FOIA.

46. The Commissioner therefore finds that FCA breached section 17(1)(b) on this occasion and that the information withheld under section 42(1) is exempt from release under section 40(1).

## **Other matters**

### **Section 8 – request for information**

47. Section 8(1) of the FOIA describes a valid request for information as one that (a) is in writing; (b) states the name and address of the applicant and (c) describes the information requested.

48. Request 2b) reads as follows:

*"My record should be on FCA's files but I will supply a copy upon request if need be; I would like to have sight of all written evidence from FSA's rules and from any and all other pertinent sources that clarify the answer to this question and upon which FSA would have relied had I challenged its decision to decline my application had it done so."*

3. In the Commissioner's view – which she has discussed with FCA - this is a hypothetical question; one that is predicated on two conditions. The answer would depend on when the decision was challenged (as to what 'rules' were in place) and what the reasons were for FSA declining the application (as to what 'rules' were relevant). The Commissioner finds that this 'request' does not adequately describe the information requested and it is therefore not a valid request for information under the FOIA. As such, FCA was not obliged to comply with it.

## Right of appeal

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49. 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](mailto:GRC@hmcts.gsi.gov.uk)

Website: [www.justice.gov.uk/tribunals/general-regulatory-chamber](http://www.justice.gov.uk/tribunals/general-regulatory-chamber)

50. 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.
51. 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 .....**

**Andrew White**  
**Group Manager**  
**Information Commissioner's Office**  
**Wycliffe House**  
**Water Lane**  
**Wilmslow**  
**Cheshire**  
**SK9 5AF**

## APPENDIX

*I wish to make the following enquiries under the specific provisions of the Freedom of Information Act (FOI). I understand that FCA's Complaints Team is ultimately responsible to you, which is why I am addressing to you what follows. Background to the questions is in black, the questions themselves are in red and the verbal and written records of which I would like to have sight are identified in **boldfaced red**.*

1. FSA/FCA Register records

*The law requires FSA/FCA to publish a Register and maintain it accurately at all times, for the benefit of users. One of its fundamental purposes is to clarify who owns whom, who is authorised and regulated by whom and who carries out which regulatory controlled functions for whom at any given time; another is to clarify which individuals and firms are no longer authorised.*

- a) *What specific information are "CF1(AR) Director" records on the Financial Services Register supposedly intended to convey to Register users that is not already fully explained and accounted for in separate records displayed under "Firms" in which "AR" relationships and the identities of "AR" firms' directors are clearly and accurately shown?*

***This question relates to records on the Register whose intended meanings (according to FCA) are broadly identical and may be seen on the Register; it is***

- 1. "why are these records duplicated when no others are duplicated?" and***
- 2. "why are they expressed as though they are intended to convey different information?"***

***I would therefore like have sight of records of all discussions and written exchanges between the Complaints Team, the Register Team and anyone else directly or indirectly involved in the matter in which it was agreed between those parties that this duplication of information and those presentational differences were acceptable.***

- b) *For what reason has FSA/FCA deemed it necessary to single out just one particular record type in the Register, namely that of "CF1(AR) Director", as requiring a paragraph of explanatory text, when all other types are reckoned to be self-sufficient and self-explanatory?*

***This question relates to the explanatory text added to the Register as referred to in the decision letter in respect of our complaint; I would like to have sight of records of all discussions and written exchanges between the Complaints Team, the Register Team and anyone else directly or indirectly involved in the matter that led to the decision to add this "explanatory text".***

- c) *Why does FSA/FCA not ensure that each and every record type on the Register is clear and unequivocal in order to avoid any requirement for explanatory text?*

***This question is linked to b) above and I would accordingly like to have sight of all records of discussions and written exchanges between the Complaints Team, the Register Team and anyone else directly or indirectly involved in the matter in which it was eventually agreed that these records were different from all others on the Register in requiring "explanatory text".***

- d) *As the addition of such explanatory text to those pages has not been possible without expenditure of funds, it may reasonably be presumed that the addition of the same or similar text to the pages of every other individual recorded on the Register as “CF1(AR) Director” with a principal firm name against it has come at a far from inconsiderable cost, how might FCA justify such cost?*

***This question relates to the cost of adding the “explanatory text” to the Register so that it is visible above not just our own records but those of most if not all individuals thereon and I would like to have sight of a breakdown of that cost, not least so that it can be compared with the alleged cost estimate referred to in 3. below; I would also like to have sight of all records of verbal discussions and written exchanges between the Complaints Team, the Register Team and anyone else directly or indirectly involved in the matter that led to the preparation of that cost estimate and that demonstrate that all of those involved agreed that it was correct.***

*With regard to d) above, whilst FCA has given no idea of the precise cost implications of investigating the practicalities and possible consequences of these additions or the number of individuals’ pages to which it has presumably been applied, it does appear that it has deemed the cost of so doing as acceptable, whereas that of implementing amendments for which individuals might ask appears not to have been the case, as in the £50K–£100K cited in 3. below in one particular case.*

## 2. FSA/FCA Approved Persons Scheme

- a) *For what reason/s does FSA/FCA perceive that a person must seek and be granted approval under this scheme when that person does not intend to carry out regulatory controlled functions at any time?*

***Records for me show that I was asked and agreed to complete an application in respect of regulatory controlled functions in 2004 and that the only box ticked was that of “CF1 Director”; I had no need to apply for approval to become such a director as I had been a director of our firm for around a decade by that time and, in any case, FSA could not have granted approval for me to function as a company director. I would like to have sight of all records of verbal discussions and written exchanges that relate to the requirement for and acceptance of my application under the above circumstances.***

- b) *What would have been the regulatory and other consequences for me and for our firm’s entitlement to FSA authorisation had FSA declined my application for approval under the Scheme or had I declined to submit any applications for such approval? **My record should be on FCA’s files but I will supply a copy upon request if need be; I would like to have sight of all written evidence from FSA’s rules and from any and all other pertinent sources that clarify the answer to this question and upon which FSA would have relied had I challenged its decision to decline my application had it done so.***

- c) *FCA notes that its Scheme is free-standing and, under section 59 of FSMA2000, it can set out what functions are “controlled functions” and that “any rôle at a regulated firm that is designated as a controlled function requires FCA approval”; as this suggests that the law entitles FCA to redefine a **status** such as company Director (which is not in and of itself a function per se) as a **regulatory “controlled function”** as set out in its list of such functions, it would appear that FCA regards this as providing carte blanche to it to treat directors of “AR” firms as though carrying out such functions merely by reason of their status as directors, irrespective of whether they are undertaking any regulatory duties of any kind at*

any time. Even if the law does grant FSA/FCA the **right** to do this, does it thereby confer upon it the **obligation** to do it and for what specific reason/s **did** FSA do it? **I would like to have sight of all written evidence in support of and explaining FSA's decision to designate my directorship of our firm as a regulatory controlled function when my application demonstrates that no regulatory controlled functions were to be carried out by me.**

- d) *As the Scheme provides that all individuals approved under it must work for the firms of which they are directors in order to merit and require such approval, for what reason did FSA nevertheless perceive the need to approve me under the scheme when it knew that I did not and would not work for our firm and had provided no evidence to suggest otherwise? **Again, please refer to my application which clarifies that I did not apply to carry out any of the controlled functions listed on it; please also provide documentary evidence that FSA mistakenly believed that I did or would work for our firm when deciding that it needed to approve me.***

### 3. Costs of amending Register records

FCA cites the sum of £50K–£100K as being required to fund the removal of two “CF1(AR) Director” records and the amendment of the “CF21 Adviser” one; it deems this unduly expensive and has accordingly given that expense as its reason not to carry out those actions. It can only be assumed that this figure has been provided by FCA’s Register team. I also assume that it includes the cost of removing/amending the similar records of everyone else likewise classified and, for the avoidance of doubt, I would not expect FCA to give anyone special treatment just because they might have raised such an issue.

FCA has also stated that making such amendments for one individual would affect other individuals’ entries on the Register, albeit without specifying details of how it would do so; this might appear to suggest inflexibility in the Register’s current design.

Leaving aside for the time being the rights and wrongs pertaining to this issue, the sum of £50K–£100K as cited in one particular case seems excessive even if it does include the cost of removing/amending others’ records besides those whose removal/amendment has been requested; FCA’s cost estimate appears not to reveal the actual cost of removing/amending the records of one or two individuals as distinct from a large swathe of them. It is the cost of removing/amending the few for which such changes have been requested, rather than that total cost of changing many more as a consequence, that is pertinent here.

- a) *In the light of the above, please clarify the specific impact/s that FCA’s complaint decision letter claims that the implementation of such changes would have upon other parts of the Register? **Please let me have sight of all records of verbal discussions and written exchanges that led to and explains the reasons behind this assertion on FCA’s part. Please also provide a breakdown of that cost estimate to include information revealing the proportion of it that would be required to remove/amend the three individual records alone, as requested,** in order that a better understanding and appreciation of these factors may be achieved than would be possible purely by reliance upon FCA’s word on them to date? **I would like also to have sight of all records of verbal discussions and written exchanges between the Complaints Team, the Register Team and anyone else directly or indirectly involved in the matter that led to preparation of and agreement with that cost estimate.***
- b) *Please explain the large margin of error in the cost estimate of £50K – £100K and why these amounts was cited instead of a single estimated figure; **again, I would***

**like to have sight of all records of verbal discussions and written exchanges between the Complaints Team, the Register Team and anyone else directly or indirectly involved in the matter that led to the agreement that so wide a margin of error was acceptable instead of one specific figure.**

- c) *Please clarify whether the above cost estimate relates to the requested amendment of those three individual records alone or to the amendment of all other records of individuals in similar positions to us. Please also confirm how many such other records FCA might deem it necessary to amend as a direct consequence of amend those three that we had requested. Finally, please confirm the specific cost of amending our three records as requested, in the light of the total cost of the amendment of all other records that FCA would deem necessary as a consequence of amending ours; i.e. if, for example, the total cost of all such amendments is £100K and the total number of records to be amended is 5,000, the cost of amending each records would be £20, so that of amending our three would be £60. **I would like to have sight of evidence of the number of records in its Register that FCA would believe it must amend should it amend our three records as requested.***
- d) *Please also confirm if the perceived cost of removing/amending one or two records is FCA's sole reason for declining to remove/amend them and, for the avoidance of doubt, please also confirm whether FCA would have removed/amended them were it not for that perceived cost. As FCA's complaint decision letter gives no other reason for declining to do this, it is reasonable to assume that it has no other reason, so **I would like to have sight of FCA's verbal and written records that evidence any other reason/s to decline to do as we have requested, together with a written explanation as to why such reason/s, if any, were excluded from its complaint decision letter and all other communications in the matter.***
- e) *As it is clear that FCA mismanaged our expectations during its complaint investigation, **I would like to have sight of all verbal and written records that evidence [Named Individual 1]'s written assurances to me that FCA was taking our complaint seriously and looking to see what FCA could do for us. I would also like to have sight of the initial draft complaint decision letter that she advised me that she had completed by 26 August 2016, together with all subsequent verbal discussions and written exchanges between her and everyone else involved in the matter up to the issue of the final decision letter by [Named Individual 2] in order to reveal an complete audit trail of the verbal discussions and written exchanges that led to the various revisions that were made to that draft during that time. I would also like to have sight of all verbal discussions and written exchanges between [Named Individual 3] and the Register Team from her initial involvement in the matter that led to her providing me with assurances that alterations to the Register were about to be agreed which were nevertheless never made.***