

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 22 April 2022

Public Authority: Tavistock and Portman NHS Foundation Trust
Address: Tavistock Centre
120 Belsize Lane
London
NW3 5BA

Decision (including any steps ordered)

1. The complainant has requested a copy of an internal report and the GMC numbers of specific clinicians.
2. Tavistock and Portman NHS Foundation Trust ('the Trust') withheld the report under section 40(2) (personal information) and the GMC numbers under section 21 (information reasonably accessible to applicant by other means) of FOIA.
3. The Commissioner's decision is as follows:
 - The first three paragraphs of the report are the personal data of the complainant and are therefore exempt under section 40(1).
 - Not all of the information within the report represents personal data and therefore cannot be withheld under section 40(2).
 - Of the information that does engage section 40(2), disclosure would not be lawful.
 - The Trust has incorrectly applied section 21 in relation to the GMC numbers.
4. The Commissioner requires the public authority to take the following steps to ensure compliance with the legislation:
 - Disclose a redacted copy of the report with all personal data removed. The Commissioner has provided a redacted copy of the report to the Trust only via a confidential annex.

- Issue a fresh refusal in response to the request for GMC numbers that does not rely upon section 21.
5. 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 FOIA and may be dealt with as a contempt of court.

Background information

6. The complainant was a patient at the Trust's Gender Identity Clinic ('GIC').
7. During their treatment, the complainant raised a complaint with the Trust about the GIC's processes, including its processing of patients' deadnames.
8. Upon receiving the complaint, and a similar complaint from another patient of the GIC, the Trust wrote a report on the GIC's processes and its compliance with the Gender Recognition Act 2004 and NHS guidelines.¹
9. As part of this complaint, the complainant also made a subject access request (SAR) under the Data Protection Act 2018 (DPA18) to the Trust. As part of this disclosure, the complainant received the minutes of two Multidisciplinary Team (MDT) meetings. These minutes included the initials of the staff who were present at the meetings.

Request and response

10. On 11 May 2021, the complainant wrote to the Trust and requested:
- "I would like a copy of the report you mentioned to me that you were writing covering this complaint, and I assume is now issued."
11. On 17 May 2021 the complainant wrote to the Trust and requested further information:
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¹ [cr181-good-practice-guidelines-for-the-assessment-and-treatment-of-adults-with-gender-dysphoria.pdf \(rcpsych.ac.uk\)](https://www.rcpsych.ac.uk/cr181-good-practice-guidelines-for-the-assessment-and-treatment-of-adults-with-gender-dysphoria.pdf)

"...I have contacted (sic) the GMC and have been told 'Under our good medical practice framework a doctor should supply their GMC number if they are asked to provide it.' I hereby request the GMC numbers of all clinicians at both MDT's, [INITIALS REDACTED] are provided to me, without delay."

12. On 24 May 2021 the Trust responded and confirmed that the report was exempt from disclosure section under 40(2) (personal information) of FOIA. It also confirmed that the GMC numbers were exempt from disclosure under section 21 (information reasonably accessible to applicant by other means).
13. Following an internal review the Trust wrote to the complainant on 25 May 2021. It upheld its previous position and confirmed to the complainant that the report did not contain any of their personal data.

Scope of the case

14. The complainant contacted the Commissioner on 25 May 2021 to complain about the way that their request for information had been handled.
15. The Commissioner therefore considers the scope of his investigation to be to determine if the Trust is correct when it says that the report is exempt under section 40(2) and the GMC numbers are exempt under section 21.

Reasons for decision

Section 40 – personal information

16. Section 40 of the FOIA states:
 - (1) "Any information to which a request for information relates is exempt information if it constitutes personal data of which the applicant is the data subject.
 - (2) Any information to which a request for information relates is also exempt information if-
 - a) It constitutes personal data which does not fall within subsection (1), and
 - b) The first, second or third condition below is satisfied."

17. In this instance the relevant condition is contained in section 40(3A)(a) which states:

- "The first condition is that the disclosure of the information to a member if the public otherwise than under this Act-

Would contravene any of the data protection principles."

18. What this means is section 40(1) applies when an individual requests their own personal data under FOIA and section 40(2) applies when an individual requests the personal data of a third party under FOIA.

19. The first step for the Commissioner in any section 40 case is to determine whether the withheld information constitutes personal data as defined by the Data Protection Act 2018 ('DPA18'). If information is not personal data then it cannot be withheld under section 40.

20. Secondly, and only if the Commissioner is satisfied that the requested information constitutes personal data, he must establish whether disclosure of that information would breach any of the data protection principles.

Is the requested information personal data?

21. Part 1, Section 3(2) of the DPA18² defines personal data as:

"any information relating to an identified or identifiable living individual."

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

23. 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.

24. An identifiable living individual is one who can be identified, either 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.

² [Data Protection Act 2018 \(legislation.gov.uk\)](https://legislation.gov.uk)

25. The Trust has confirmed to the Commissioner that the report contains the personal data of the following individuals:

- An individual clinician;
- the author of the report;
- the complainant;
- another patient of the GIC (the other complainant referred to within paragraph 8).

The Commissioner also notes that the name of another member of staff within the Trust is included within the report.

Section 40(1) - the personal data of the complainant

26. On 25 May 2021 the Trust confirmed to the complainant that the report doesn't contain their personal data, hence the Trust's handling of the request under FOIA. However, the Trust has confirmed in its submission to the Commissioner that the report does contain the personal data of the complainant.
27. The Commissioner needs to decide whether the complainant's personal data is included within the report because section 40(1) is an absolute exemption. The Commissioner also needs to consider, if this is the case, whether this information can be separated out from the rest of the report. If not, the whole report will have to be refused under section 40(1).
28. Whilst the report does not represent a complaint file, it has been written as a direct result of the complainant's complaint to the Trust. Therefore, the Commissioner considers his guidance 'Access to information held in complaint files'³ relevant.
29. The guidance states 'a complaint file will start off at the more 'personal' end of the spectrum – an exchange of personal views about an issue or something that has happened. As an investigation progresses, more general information may be included in the file...'
30. To reiterate, in order for information to be the complainant's personal data, they must be identifiable from it and it must relate to them. Looking at the report, the first three paragraphs do not name the

³ [s40 Access to information held in complaints files v3.0 \(ico.org.uk\)](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/section-40)

complainant directly but discuss the circumstances of their complaint and why the report is being written. This is the information that the Commissioner has considered in relation to section 40(1).

31. This information certainly relates to the complainant but the Commissioner must decide whether the complainant can be identified from this information, even though they are not named within the report.
32. The Commissioner's guidance 'Anonymisation: managing data protection risk code of practice'⁴ states 'where the consequences of re-identification could be significant e.g. because they would leave an individual open to damage, distress or financial loss, organisations should: adopt a more rigorous form of risk analysis and anonymisation.'
33. When considering the possibility of re-identification, both the Commissioner and the First-tier Tribunal use a 'motivated intruder' test' to ascertain if a member of the public would be able to recognise an individual if they were intent on doing so. The 'motivated intruder' is described as a person who will take all reasonable steps to identify the individual or individuals but begins without any prior knowledge. In essence, the test highlights the potential risks of re-identification of an individual from information which, on the face of it, appears truly anonymised.
34. The Commissioner is mindful that special category data may be more attractive to a motivated intruder than others and more consequential for individuals. Should re-identification occur in this instance, it would reveal the complainant's identity as a patient of the GIC; this is special category data.
35. In this case it is difficult for the Commissioner to establish the likelihood of re-identification. He does not have enough knowledge of the circumstances of the case to do so and the Trust's submission is lacking.
36. The Commissioner has taken into account that the individuals involved in the complaint in question are doctors, and staff at the Trust, whose profession imposes confidentiality rules and requires ethical conduct. Such figures are therefore not likely to represent motivated intruders.

⁴ [Anonymisation: managing data protection risk code of practice \(ico.org.uk\)](https://ico.org.uk)

37. There may be members of staff, or patients, within the GIC or the Trust who suspect the complainant may have raised a complaint or are the subject of the report. If this suspicion were to be confirmed through the disclosure of information under FOIA, this would count as re-identification.
38. Since disclosure under FOIA is disclosure to the world at large, the Commissioner must also take into account the possibility that the information might be combined with the particular personal knowledge of an individual outside of the GIC or the Trust, and they might learn something sensitive about the complainant as a result. This might include the complainant's family, friends or acquaintances.
39. The Commissioner does not know how many complaints of this nature the GIC has received from current, or past, patients. However, he is acutely aware that this is a recent complaint and the report discusses the specifics of the complaint.
40. The Commissioner believes that, from this detail, there is a real possibility that the complainant could be identified from this information even if disclosed in an anonymised form.
41. Since the Commissioner believes the complainant could be identified from this information it represents their personal data and section 40(1) is engaged. Therefore, the Trust is required to handle this information under the DPA18 and not FOIA. The Commissioner discusses this further in the 'other matters' section of this notice.
42. The Commissioner acknowledges that the complainant will be very disappointed by this decision. They were originally informed by the Trust that the report did not contain their personal data almost a year ago.
43. However, given the nature of the information contained within the report, and the fact that disclosure under FOIA is disclosure to the world at large, the Commissioner must be mindful of the potential consequences to the complainant should this information be processed under FOIA.

Section 40(2) – third party personal data

44. The Commissioner will now go onto consider whether the Trust is correct when it says that the report contains the personal data of:
 - An individual clinician;
 - the author of the report;

- another patient of the GIC (the other complainant referred to within paragraph 8).
45. Firstly, the Commissioner will consider if the reference to the other patient contained within the report constitutes their personal data. He notes that the first three paragraphs of the report that describe the complainant's concern also describe the concerns of the other patient. For the reasons described above, the Commissioner considers this information, even though it does not directly name the other patient, has just as much chance of re-identifying them as it does the complainant.
46. Again, this information represents special category data as it identifies this patient as a user of the GIC. Special category data is particularly sensitive and therefore warrants special protection. It cannot be processed (including disclosure under FOIA) unless one of the strict conditions listed in Article 9 of the UK GDPR can be met.
47. The Commissioner considers that the only conditions in Article 9 that could allow the disclosure of special category personal data under FOIA are:
- a) the data subject has given explicit consent to the disclosure;
 - e) the personal data in question has been manifestly made public by the data subject.
48. The Commissioner has seen no evidence or indication that the patient concerned has explicitly consented to this data being disclosed under FOIA. The Commissioner is also not aware of any evidence which shows that the patient had deliberately made this data public at the time of the request.
49. As none of the conditions required for processing special category data are satisfied, disclosing the information relating to the other patient of the GIC would breach principle (a) and so this information is exempt under section 40(2) of FOIA.
50. Moving onto the staff within the Trust, the Commissioner notes that an individual clinician is named within the report and is therefore identifiable. The report also discusses the complaints raised about this clinician and therefore relates to them.
51. The author of the report is also named within the report and is therefore identifiable from it.

52. The Trust has stated that the whole of the report represent the author's opinions and therefore constitutes their personal data. The Trust hasn't expanded on this argument.
53. The report is signed by the author and therefore any opinions contained within are attributable to them. However, for these opinions to represent the personal data of the author they must also relate to the author.
54. The Commissioner's guidance states 'the following questions may help decide whether information recording an individual's opinion is their personal data:
 - Does the opinion tell you anything significant about the individual holding the opinion – for example biographical details, characteristics or their personal beliefs?
 - Just how 'personal' is the opinion? Is it a subjective, personal view rather than a professional, objective appraisal of an individual or issue?
 - Is the opinion being used, or could it be used, to find out something about the individual holding the opinion, to treat him or her in a certain way or to inform a decision in respect of him or her?'
55. Having viewed the report, the Commissioner does not consider the opinions, which are a professional assessment of the GIC's processes as a result of the complaints, represent the personal data of the author of the report.
56. The Commissioner is satisfied however that the report contains the personal data of the author, a clinician and another member of staff. These three members of staff all represent data subjects whose personal data have been requested under FOIA.
57. The fact that information constitutes personal data does not automatically exclude it from disclosure under FOIA. The Commissioner must now consider whether disclosure of the requested information would contravene any of the data protection principles.

58. The most relevant data protection principle in this case is principle (a) which states that "Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject"⁵.

Would disclosure contravene principle (a)?

59. Personal data is processed when it is disclosed in response to the request. This means that a public authority can only disclose personal data in response to an FOI request if to do so would be lawful, fair and transparent.
60. In order to be lawful, one of the lawful bases listed in Article 6(1)⁶ of the UK General Data Protection Regulation (UK GDPR) must apply to the processing.

Lawful processing: Article 6(1)(f) of the UK GDPR

61. The Commissioner considers that the lawful basis most applicable is basis 6(1)(f) which states: "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data."
62. In considering the application of Article 6(1)(f) of the UK GDPR in the context of a request for information made under the FOIA, it is necessary to consider the following three-part test:
63. **i) Legitimate interest test:** Whether a legitimate interest is being pursued in the request for information;
ii) Necessity test: Whether disclosure of the information is necessary to meet the legitimate interest in question;
iii) Balancing test: Whether the above interests override the legitimate interest(s) or fundamental rights and freedoms of the data subject.

⁵ [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC \(General Data Protection Regulation\) \(Text with EEA relevance\) \(legislation.gov.uk\)](#)

⁶ [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC \(General Data Protection Regulation\) \(Text with EEA relevance\) \(legislation.gov.uk\)](#)

64. The Commissioner considers that the test of 'necessity' under stage (ii) must be met before the balancing test under stage (iii) is applied.

Legitimate interest test

65. The Commissioner must first consider the legitimate interest in disclosing the personal data to the public and what purpose this serves. In considering any legitimate interest(s) in the disclosure of the requested information under FOIA, the Commissioner recognises that a wide range of interests may represent legitimate interests; they can be the requester's own interests as well as wider societal benefits. These interests can include the broad principles of accountability and transparency that underpin FOIA, or may represent the private concerns of the requestor.
66. It is important to remember that disclosure under FOIA is effectively disclosure to the world at large. The Commissioner is of the opinion that, if the requester is pursuing a purely private concern which is unrelated to any broader public interest then disclosure is unlikely to be proportionate. Legitimate interests may be compelling or trivial, but trivial interests may be more easily overridden by the fundamental rights and freedoms of the data subject during the test under stage (iii).
67. In this case it is clear that the complainant is seeking access to the withheld information for a specific reason: they are dissatisfied with the treatment they received at the GIC. They are concerned that the GIC's processes were unlawful and wants to see what steps were taken, and what recommendations were made, as a result of their complaint.
68. With the above in mind, the Commissioner is satisfied that there is a compelling private legitimate interest, and a wider legitimate interest in relation to how the Trust treats gender dysphoria patients, represented in this request.

Necessity test

69. The Commissioner must also consider if disclosure is necessary for the purpose that this legitimate interest represents or if there is an alternative method of doing so.
70. 'Necessary' means more than desirable but less than indispensable or absolute necessity. The necessity test is a means of considering whether disclosure under FOIA is necessary to meet the legitimate interest identified, or whether there is another way to do so that would interfere less with the privacy of individuals.

71. The Commissioner is satisfied that the report requested in this case has not otherwise been made available to the public. Therefore, there are no less intrusive means of achieving the legitimate aims identified in stage (i).

Balancing test

72. Since the Commissioner is satisfied that disclosure is necessary for the purpose that this legitimate interest represents, he will now go onto consider whether the identified interests in disclosure outweigh the interests or fundamental rights and freedoms of the data subjects.
73. For example, if the data subjects would not reasonably expect that the information would be disclosed to the public under 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.
74. In performing this balancing test, the Commissioner has considered the following:
- 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 to the disclosure; and
 - the reasonable expectations of the individual.
75. In the Commissioner's view, the balancing test should take into account whether the data subjects' concerned have a reasonable expectation that their information would not be disclosed. This expectation may be influenced by a number of 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 individuals, and the purpose which this personal information serves.
76. It is also important to consider whether disclosure would be likely to result in unwarranted damage or distress to that individual.
77. The Trust has stated 'all those discussed in the report would recognise themselves, which would be likely to cause distress to them.' To reiterate, the Commissioner is only considering the distress to the staff of the Trust as the information relating to the complainant is exempt under section 40(1) and the other patient under section 40(2).

78. The Trust has stated that 'any legitimate interests of the applicant are outweighed by the legitimate interests of others referred to in the report, and the Trust itself, since the report was created with the expectation that it would remain confidential.'
79. The Commissioner's guidance⁷ makes it clear that 'The issue is not simply whether an employee has an expectation that their personal data is not disclosed, but whether that expectation is a reasonable one to hold.' If the report in question is addressing alleged shortcomings in the GIC, or the performance of a particular clinician, there is a legitimate interest in this information, particularly when considered against the backdrop of further concerns surrounding the GIC.⁸
80. Just because disclosure may cause distress to the data subject, and they may have a reasonable expectation that their personal data would not be disclosed, does not necessarily mean that a public authority should automatically discount the possibility. A public authority must always consider the individual circumstances of the case.
81. However, the Commissioner recognises that disclosing the personal data of specific staff would be unfair in response to what appear to be complaints raised about the general process of the GIC and the Trust as a whole. One member of staff is mentioned briefly as providing what appears to be administrative support in response to the complaint. Disclosure of their name, given their limited involvement, does not seem proportionate.
82. Furthermore, the complainant is already aware of the author of the report and the clinicians treated them. They do not need the personal data contained within the report to decide if they wish to raise a complaint about a certain individual with the GMC and their request for GMC numbers is covered later on in this notice.
83. In this instance, the Commissioner remains mindful of the overarching legitimate interest represented in this request; the complainant wishes to hold the GIC and the Trust accountable for specific failings.
84. Further scrutiny of the GIC, and the pursuant of any further complaint that the complainant may wish to make, can occur without the disclosure of the personal data of the data subjects. Therefore, there is

⁷ [Requests for personal data about public authority employees \(ico.org.uk\)](https://ico.org.uk/requests-for-personal-data-about-public-authority-employees)

⁸ [Interim report – Cass Review \(independent-review.uk\)](https://independent-review.uk/)

no Article 6 basis for processing and disclosure of the personal data contained within the report would be unlawful.

85. Having decided that disclosure would be unlawful, the Commissioner does not need to go on to separately consider whether disclosure would be fair or transparent.

The confidential annex

86. It is important at this stage to reiterate that FOIA is a request for information that a public authority holds and not whole documents.
87. The Trust has stated that, in relation to the report, 'There is no information that could be redacted that would mean personal data would not be revealed to the applicant, and by implication to the public at large.'
88. However, the Commissioner disagrees. Section 40 can only engage information which both identifies and relates to a living individual and the Commissioner notes that parts of the report discuss the GIC's generic processes and its compliance with NHS guidelines. The Commissioner has also decided that, whilst this information may represent the opinions of the author, it is not their personal data.
89. Whilst the Commissioner has decided that the personal data of all data subjects, including the complainant, can be withheld under either section 40(1) or section 40(2), he notes that section 40 has been applied to the report as a whole and has clearly been misapplied to some information.
90. With this in mind, he has provided the Trust with a confidential annex which highlights the information that does represent personal data. The information not highlighted must be disclosed.

Section 21 – information reasonably accessible to applicant via other means

91. Section 21 of FOIA states that:

“(1) Information which is reasonably accessible to the applicant otherwise than under section 1 is exempt information.

(2) For the purposes of subsection (1)—

- a) information may be reasonably accessible to the applicant even though it is accessible only on payment, and

- b) information is to be taken to be reasonably accessible to the applicant if it is information which the public authority or any other person is obliged by or under any enactment to communicate (otherwise than by making the information available for inspection) to members of the public on request, whether free of charge or on payment.”
92. The Commissioner considers that the purpose of section 21 is to protect the resources of public authorities by exempting it from providing information which the requestor can access via alternative means. These alternative means must be reasonably accessible to the applicant through a clear, existing mechanism which exists outside of FOIA.
93. The purpose of section 21 is to ensure that there is no right of access to information via FOIA if it is available to an individual by another established route. Unlike most exemptions, the specific circumstances of the requestor must be considered when applying section 21. This is confirmed in the Commissioner’s guidance.⁹
94. In its refusal notice to the complainant the Trust wrote ‘With regard to staff GMC numbers, you can subscribe to download the full GMC register at...¹⁰.’
95. The complainant has raised several concerns with the Commissioner regarding the Trust’s application of section 21. The complaint is concerned that, whilst they were told that the initials contained within the MDT minutes cross reference with the names on the Trust’s website and the GMC website, this information is not ‘reasonably accessible’ to them.
96. The complainant has explained that there are some initials with no corresponding member of staff listed on the Trust’s website. The complainant is also concerned that there are some staff listed on the Trust’s website with the same initials, meaning it is not possible to ascertain which member of staff was present at the MDT meeting.

⁹ [Information reasonably accessible to the applicant by other means \(section 21\) \(ico.org.uk\)](https://ico.org.uk/information-accessible-by-other-means/)

¹⁰ [Download the register - GMC \(gmc-uk.org\)](https://gmc-uk.org/register/)

The Commissioner's view

97. To reiterate, in order to engage section 21 a public authority must take into account the specific circumstances of the requestor. The Commissioner can see that, in order to search the GMC register for a clinician's GMC number, you need their first name or surname.
98. If the complainant cannot successfully match the initials in question with the clinician listed on the Trust's website (because there is either no doctor, or more than one doctor, with the initials listed), they cannot search for a GMC number on the GMC's website.
99. Therefore, the Commissioner believes that section 21 has been applied inappropriately in this instance because the information is not reasonably accessible to the complainant by other means.
100. The Trust has explained to the Commissioner that it does not hold a copy of the MDT minutes with the full names of the clinicians in attendance. The Trust has explained that MDT meetings often discuss multiple patients at once and involve staff from other organisations who may be involved in the patients' care and treatment.
101. Whether the Trust holds a record that establishes the identity of those present at the MDT meetings is not the subject of the Commissioner's investigation. The Commissioner only needs to decide whether the Trust is entitled to rely upon section 21 in relation to the GMC numbers and the Commissioner has decided that it is not.
102. Therefore, the Commissioner requires the Trust to issue a fresh refusal notice to the complainant that does not rely upon section 21. If the Trust does not hold this information, it must confirm this to the complainant.

Other matters

103. The Trust first told the complainant that the report did not contain their personal data. Then, during this investigation, the Trust confirmed to the Commissioner that the report did contain the personal data of the complainant.
104. The Commissioner has decided that the first three paragraphs of the report represent the personal data of the complainant and are therefore exempt under section 40(1) of FOIA.
105. This decision notice looks at the Trust's compliance with FOIA only and therefore the Commissioner cannot order the Trust to consider information under another access regime. However, the Commissioner expects the Trust to consider the first three paragraphs of the report

under the DPA18 and, if it considers any of this information exempt, to explain to the complainant why.

Right of appeal

106. 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

107. 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.
108. 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

Alice Gradwell
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