

Freedom of Information Act 2000

Decision notice

Date: 30 August 2017

Public Authority: Department for Work and Pensions
Address: Caxton House
Tothill Street
London
SW1H 9NA

Decision (including any steps ordered)

1. The complainant requested project assessment reviews reports (PAR reports) carried out for the Universal Credit Programme (UCP) from the Department for Work and Pensions (DWP). The DWP refused the request, as sections 36(2)(b)(i) and (ii), and 36(2)(c) of the Freedom of Information Act 2000 (the Act) were engaged and the balance of the public interest test favoured maintaining the exemption.
2. The Commissioner's decision is that the DWP is correct that section 36 of the Act is engaged, but finds that the balance of the public interest supports disclosure of the requested information. The Commissioner also finds that the DWP should withhold the personal data of individuals named in the report who are not at senior civil service grade under section 40(2) of the Act.
3. In regards to procedural matters in the handling of the request, the DWP breached section 17(3) of the Act as it failed to provide the complainant with a section 36 refusal notice within such time as is reasonable.
4. The Commissioner requires the public authority to take the following steps to ensure compliance with the legislation.
 - Disclose the PAR reports in full except for the names of staff who are not at senior civil service grade.
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 the Act and may be dealt with as a contempt of court.

Background information

6. The UCP is a programme intended to replace a large number of benefits with a single regime. One of the PAR reports confirmed that the UCP may affect 11 million UK citizens, and the DWP's submissions stated that there were 450,000 claimants on the UCP caseload. When the then Deputy Prime Minister Nick Clegg MP introduced the white paper that led to the UCP he described it as "the most radical overhaul of our welfare system since its inception".¹
7. The PAR reports considered in this decision are assurance reviews carried out by the Major Projects Authority, which was tasked with working with government departments to provide independent assurance on major projects. The reports are tailored to the terms of reference of the project and provide a detailed assessment of the risks faced and the progress that has been achieved.

Request and response

8. On 24 April 2016, the complainant wrote to DWP and requested information in the following terms:

"Please disclose the project assessment review reports ("PARR") produced in respect of the Universal Credit Programme ("UCP") following reviews completed in:

- May 2012
- February 2013
- June 2013
- March 2014

If a project assessment review was carried on the UCP in 2015 please disclose the PARR produced following that review."

¹ <https://www.gov.uk/government/news/welfare-reform-white-paper-universal-credit-to-make-work-pay-radical-welfare-reforms-bring-an-end-to-complex-system>

9. The DWP responded on 6 June 2016 and confirmed that it held information relevant to the request. It stated that section 36 of the Act was engaged, but by virtue of section 10(3) of the Act more time was required to consider the balance of the public interest. The DWP sent additional section 10(3) notices to the complainant on 24 June, 30 June, and 29 July 2016.
10. The complainant appealed to the Commissioner about the delay in obtaining a response from the DWP. The Commissioner informed the DWP that it needed to provide the complainant with the balance of the public interest test or she would issue a decision notice ordering the response to be sent to the complainant.
11. The DWP wrote to the complainant on 5 October 2016 and refused the request under section 14(1) of the Act, as it considered the request to be vexatious. The DWP's argument was as follows:

"You have already complained about the delay and a response been has been provided. As made clear in the repeat request, you have also already complained to the Information Commission Office (ICO) about the delay in responding to your request for the Project Assessment Review Reports therefore, it would be a duplication of resource to reply again here."
12. The Commissioner wrote to the DWP on the same date and made it explicitly clear that the complainant's appeal was in relation to the DWP's failure to provide a substantial response. That the DWP's failings meant that the complainant had appealed to the Commissioner was not in any way supportive of refusing the request as vexatious. The Commissioner asked the DWP to reconsider the complainant's request; should it wish to maintain the section 14(1) refusal then the Commissioner would proceed on that basis, but that the DWP had shown no evidence to suggest the request was vexatious.
13. The DWP issued its refusal notice on 9 November 2016. The DWP stated that sections 36(2)(b)(i) and (ii), and 36(2)(c) of the Act were engaged, and the balance of the public interest favoured withholding the information.
14. Due to the six month delay in the DWP issuing a refusal notice the Commissioner waived the need for an internal review. Whilst in most circumstances one is required, in this instance the Commissioner would have expected both the initial refusal and internal review to have been carried out within six months. As the DWP had sufficient time to make its decision it seemed sensible for the Commissioner to proceed with her investigation.

Scope of the case

15. The complainant contacted the Commissioner on 2 August 2016 in relation to the DWP's delay in providing him with the balance of the public interest test.
16. After the DWP issued its section 36 refusal notice the complainant informed the Commissioner on 10 November 2016 that he wished to proceed with an appeal against the refusal of his request.
17. The Commissioner considers the scope of the case to be whether the DWP is entitled to refuse the request under sections 36(2)(b)(i) and (ii), and 36(2)(c) of the Act. Should the Commissioner find that the PAR reports should be disclosed she will consider whether the third party personal data contained in the reports can be withheld under section 40(2) of the Act. The Commissioner shall also consider the length of time the DWP took to issue its refusal notice to the complainant.

Reasons for decision

Section 36 – prejudice to effect conduct of public affairs

18. The DWP argued that the withheld information was exempt from disclosure on the basis of sections 36(2)(b)(i) and (ii) and 36(2)(c) of the Act. These state that:

'(2) Information to which this section applies is exempt information if, in the reasonable opinion of a qualified person, disclosure of the information under this Act...

(b) would, or would be likely to, inhibit-

(i) the free and frank provision of advice, or

(ii) the free and frank exchange of views for the purposes of deliberation, or

(c) would otherwise prejudice, or would be likely otherwise to prejudice, the effective conduct of public affairs.'

19. In order to determine whether sections 36(2)(b)(i) and (ii), and section 36(2)(c) can be used to withhold the requested information the Commissioner will need to determine whether a qualified person has provided a reasonable opinion that disclosure would cause the prejudice cited. As section 36 is a qualified exemption the Commissioner shall go on to consider the balance of the public interest test should she find that the exemption is engaged.

Qualified person's opinion

20. In this case Lord Freud provided the opinion in relation to the application of the exemptions contained at section 36 in his role as Minister for Welfare Reform (he has subsequently resigned the position). The Commissioner is satisfied that the Minister is a qualified person for the purposes of section 36.
21. In determining whether these exemptions are engaged the Commissioner must determine whether the qualified person's opinion was a reasonable one. In doing so the Commissioner has considered all of the relevant factors including:
 - Whether the prejudice relates to the specific subsection of section 36(2) that is being claimed. If the prejudice or inhibition envisaged is not related to the specific subsection the opinion is unlikely to be reasonable.
 - The nature of the information and the timing of the request, for example, whether the request concerns an important ongoing issue on which there needs to be a free and frank exchange of views or provision of advice.
 - The qualified person's knowledge of, or involvement in, the issue.
22. In determining whether the opinion is a reasonable one, the Commissioner takes the approach that if the opinion is in accordance with reason and not irrational or absurd – in short, if it is an opinion that a reasonable person could hold – then it is reasonable. This is not the same as saying that it is the only reasonable opinion that could be held on the subject. The qualified person's opinion is not rendered unreasonable simply because other people may have come to a different conclusion. It is only not reasonable if it is an opinion that no reasonable person in the qualified person's position could hold. The qualified person's opinion does not have to be the most reasonable opinion that could be held; it only has to be a reasonable opinion.
23. The qualified person's opinion stated that PARs are carried out under conditions of non-attribution in order to encourage candour. Interviewees are informed of this in advance so that the review may receive full and frank arguments about the progress of the UCP. The argument was made that PARs will not be effective unless they are a collaborative process in which interviewees feel comfortable providing these full and frank viewpoints. Furthermore, the qualified person's opinion stated that were PARs routinely disclosed then reviewers would draft them more "defensively", and the concerns over the distortion of comments in the public domain would delay the production of reports and reduce their effectiveness.

24. The Commissioner is satisfied that the qualified person's opinion is reasonable under the circumstances and shows that it is reasonable to argue that the disclosure of the PAR reports would impede on staff's willingness to provide free and frank advice, as per section 36(2)(b)(i) and (ii). Similarly, the Commissioner is satisfied that the qualified person's opinion has also shown it is reasonable to argue that the routine disclosure of PAR reports would reduce their effectiveness, as the staff carrying out the reviews would become more defensive and be less willing to explicitly identify potential risks to the programme.
25. As the Commissioner has found that sections 36(2)(b)(i) and (ii) and 36(2)(c) are engaged she shall go on to consider the balance of the public interest test.

Public interest test

26. The Commissioner is mindful that there was a previous decision in relation to the 2011 PAR report. The Commissioner's decision notice found that the public interest test favoured disclosing the PAR report, and that the DWP's appeal to the First Tier Tribunal was not upheld.²
27. In reaching her decision the Commissioner has considered the balance of the public interest test from when the qualified person gave their opinion, which was 9 November 2016. This reflects the position taken by the Upper Tribunal in *APPGER v ICO and Foreign and Commonwealth Office* (UKUT 0377 (ACC), 2 July 2015). This judgment concluded that 'the public interest should be assessed by reference to the circumstances at or around the time when the request was considered by the public authority (including the time of any internal review)'.³

Arguments in favour of maintaining the exemption

28. The DWP provided a number of arguments in favour of maintaining the exemption:
- a) Where government reforms are "extensive and innovative" – such as with UCP – the public interest must favour ensuring the UK

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[http://informationrights.decisions.tribunals.gov.uk/DBFiles/Decision/i1739/SIater,%20John%20EA-2013-0145%20\(11.03.16\).pdf](http://informationrights.decisions.tribunals.gov.uk/DBFiles/Decision/i1739/SIater,%20John%20EA-2013-0145%20(11.03.16).pdf)

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<http://administrativeappeals.decisions.tribunals.gov.uk//judgmentfiles/j4597/%5B2016%5D%20AACR%205ws.doc> see paragraph 44

Government is able to access and exchange views in an "uninhibited way".

- b) There is a public interest in ensuring that systems of internal management and external assurance which govern UCP are as robust as they can be. The DWP considers that disclosure of the requested information would inhibit the provision of free and frank advice, and put at risk the quality of advice and decisions taken.
- c) In the qualified person's opinion it was stressed that UCP is already under scrutiny from the National Audit Office (NAO), the House of Commons Public Accounts Select Committee, and the House of Commons Work and Pensions Committee. The argument was made that the select committees are conducted in public and governance issues can be addressed if it is required.

Arguments in favour of disclosing the withheld information

- 29. As was established in the previous First-Tier Tribunal case, the recommendations identified in PAR reports should be implemented within six months of the report being issued. By the time the subsequent report is issued the previous one is historic. This supports the view that the reports from 2012 – 2014 are historic and so the harm referred to by the DWP is much diminished. In relation to the 2015 report, this was issued on 26 October 2015. As the DWP did not refuse the complainant's request under section 36 of the Act until 9 November 2016 it is evident that the DWP had more than the six months required to implement any recommendations from the PAR report.
- 30. The complainant stated to the Commissioner that the UCP was hailed as the "most radical design of the benefits system this country has ever seen" by the then Secretary of State for Work and Pensions, Iain Duncan Smith MP. The complainant argued that the UCP had been beset with problems from the start, and as a result was being delivered massively over budget and several years behind schedule. In his view, the public interest in favour of disclosure was "overwhelming".
- 31. The Commissioner acknowledges the complainant's argument and is mindful of the issues he identified. One of the PAR reports identified that the UCP could affect as many as 11 million people in the UK so there is a strong argument for transparency in how the UCP is being delivered. The Commissioner also finds that the withheld information would provide valuable insight into the management of the UCP and allow for greater understanding of what the UCP did to identify and tackle the issues that it encountered. This would help promote the value of PAR reports and give the public useful information about how major projects are managed.

32. The Commissioner notes that the consulted employees are named in an accompanying annex, but it is clear that the comments are not attributed to any employee. This was acknowledged in the qualified person's opinion. It might be possible for some individuals involved in UCP with knowledge of the programme to determine the source of a comment, but it is clear this is beyond most people. The chance of an individual being harmed from unwarranted criticism because they are identified as the source of a comment given anonymously to the PAR is seen as remote. Therefore, in the Commissioner's view it is not evident that disclosure would cause any harm to the individuals providing the free and frank advice.
33. Further – and specifically in response to the DWP's argument listed at point 28.a) – the Commissioner is not convinced that the staff concerned would be inhibited through disclosure. The UCP is already put through scrutiny by the bodies listed in 28.c) (as well as the Office for Budget Responsibility). The Commissioner expects senior staff selected to lead on a landmark programme would be able to cope with criticism where details of the programmes governance put into the public domain.
34. On the subject of scrutiny of the UCP, the Commissioner acknowledges the work of the NAO, the House of Commons select committees, and the Office of Budget Responsibility. Whilst this does go some way to meeting the requirement for transparency the Commissioner is of the view that the PAR reports provide a distinct insight into the governance of the UCP and allow for even greater transparency. Given the sizeable difficulties that the UCP has encountered – going over-budget, claims of money wasted on its IT system, the completion time moved from 2017 to 2021 – it must be noted that there is a sizeable argument in favour of increased accountability, through disclosure of the PAR reports.

Balance of the public interest test

35. The Commissioner is mindful of the stature of this programme, and recognises that this creates conditions where frank analysis and the identification of risks need to be protected whilst they are being addressed. However, she is also mindful of the accountability and transparency that is required with such a programme, especially one that has been subject to a number of high-profile failings.
36. It is evident that the UCP is already subject to scrutiny from the NAO, the House of Commons committees, and the Office of Budget Responsibility. However, it is clear that the PAR reports provide valuable information that has greatly affected the implementation of the UCP. For

example, the National Audit Office report of 26 November 2014 states that the PAR report from February 2013 raised serious concerns about the UCP which lead "to a reset of the programme between February and May 2013".⁴ The PAR reports go beyond what is already available in the public domain and provide useful information about the governance of the UCP, which allows for greater transparency into the workings of the programme and greater understanding of the difficulties that were encountered.

37. The Commissioner notes the DWP's concerns regarding the resolution of its staff to provide free and frank advice where disclosure is routine, but in this instance she considers that there has been sufficient time between the reports being issued and the DWP considering the requests. The recommendations in the report should be addressed within six months; the last report that comes within the scope of the request was issued on 26 October 2015, whereas the DWP's refusal was not issued until 9 November 2016. The Commissioner's view is that senior staff should be prepared to provide criticism and identify risks knowing that their comments – which the Commissioner wishes to stress again are not attributed – would be placed into the public domain 12 months later.
38. The Commissioner's decision is that the balance of the public interest favours disclosure of all of the PAR reports. The age of the reports show that the need to protect free and frank advice is lessened, the reports provide a much greater insight than any information already available about the UCP, there are strong arguments for transparency and accountability for a programme which may affect 11 million UK citizens and process billions of pounds, which has had numerous reported failings in its governance. These arguments outweigh the need to protect advice provided in the now historic PAR reports.
39. As the Commissioner has found that the PAR reports should be disclosed she will go onto consider whether the third party personal data in the reports can be withheld under section 40(2) of the Act.

Section 40(2) – third party personal data

40. Section 40(2) of the Act states that information is exempt if it is third party personal data, and that disclosure would breach any of the data protection principles.

⁴ <https://www.nao.org.uk/wp-content/uploads/2014/11/Universal-Credit-progress-update.pdf#page=7>

41. In order to determine whether section 40(2) is engaged the Commissioner will need to determine the following:

- whether the information is personal data.
- whether disclosure would contravene any of the data protection principle.
 - For the purposes of her decision the Commissioner has focussed on the first data protection principle. This states that personal data can only be disclosed where it is fair and lawful to do so, and where one of the conditions in schedule 2 of the Data Protection Act (DPA) is met.

Is the information third party personal data?

42. Personal data is defined in the DPA as:

“data which relate to a living individual who can be identified –

(a) from those data, or

(b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller,”

43. The relevant information in the PAR report is displayed in two locations. The first is on the front page, which details the individuals involved in carrying out the report and the individuals responsible for the UCP. The second is contained in an annex, which lists the individuals who were interviewed as part of the review.

44. In both instances the information shows names of individuals. From this information these individuals can be identified and so the Commissioner is satisfied it is personal data.

Would disclosure contravene the first data protection principle?

45. In order to determine whether disclosure of the personal data would contravene the first data protection principle the Commissioner will consider the following:

- Nature of the information
- Reasonable expectations of the data subjects
- Consequences of disclosure
- Legitimate interests in disclosure

46. Should the Commissioner conclude that it would not contravene the first data protection principle to disclose personal data she shall go on to consider whether any of the conditions from schedule 2 of the DPA are met.

Nature of the information

47. The nature of the information is the names of senior members of staff at the DWP and other public authorities. The information confirms that they have taken part in the PAR review, either as a review team member or as an interviewee.

Reasonable expectations of the data subjects

48. The personal data relates to all of the individuals professional lives, which does not afford as much protection as if the information related to their private lives. Whilst this is not the decisive factor on whether it is fair to disclose the information it is taken into the Commissioner's considerations.
49. The Commissioner notes that a large number of the individuals involved in the PAR report are senior civil servants. Where public sector employees are at senior civil servant level there is a reasonable expectation that their personal data held in relation to their professional lives may be disclosed. This reasonable expectation is not considered to be applicable for the employees who are not at senior civil service grade.
50. The senior civil servants are by and large connected to the UCP through information available in the public domain. The remainder are either in positions at the DWP where it would seem reasonable they were consulted in relation to the UCP, or from other public authorities who are known to be connected to the programme. The Commissioner considers this would create a reasonable expectation that their personal data may be disclosed due to their relationship with the UCP.

Consequences of disclosure

51. There is a general principle of fairness meaning that individuals have a right to a private life. The Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995, to which the DPA gives effect, contains a reference to protecting privacy rights, as recognised in article 8 of the European Convention on Human Rights. Disclosure of the personal data would represent an intrusion on those rights.

Legitimate interests in disclosure

52. There is a legitimate interest in knowing which civil servants were involved in the PAR reports, as this would provide an insight into the scope of the reports and who were consulted on how the UCP was progressing. Disclosure of the information would provide transparency and accountability into the governance of the UCP.

Commissioner's conclusion on fairness

53. The Commissioner acknowledges that disclosure of the personal data would represent an intrusion into the privacy rights of the data subjects, which can only be justified where there is sufficient reason to do so. In this instance, the Commissioner considers that there is sufficient reason for the senior civil servants named in the PAR reports, but not for the junior staff. The senior civil servants would have a reasonable expectation that their personal data may be disclosed in relation to their professional work, especially where they are known in the public domain to be connected to the work, and also where there is a strong legitimate interest in the information being disclosed. The Commissioner does not consider that the same can be said for the junior employees, as the reasonable expectations would not be the same, and they are not prominently connected to the UCP in the public domain.
54. As the Commissioner has found that it would be fair to disclose the personal data of the senior civil servants she has gone on to consider whether any of the conditions from schedule 2 of the DPA can be met.

Schedule 2 condition

55. For the purposes of her decision the Commissioner has focussed on the sixth condition, which states:

"The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject."

56. The sixth condition carries a three part test which the Commissioner shall address in turn:
- there must be a legitimate interest in disclosing the information;
 - disclosure into the public domain must be necessary to meet that public interest; and
 - would disclosure cause any unwarranted harm to the individuals?

Legitimate interest in disclosure

57. The Commissioner considers that she has already demonstrated a legitimate interest in disclosure whilst considering the first data protection principle.
58. Additionally, the UCP is a significant DWP programme with much publicised failings in its governance. There is a legitimate interest in knowing more information about the senior civil servants tasked with identifying issues in the programme.

Is disclosure necessary to meet that public interest?

59. Whilst a good number of the individuals are connected to the programme in the public domain it is not known that they were involved in the PAR report process. Disclosure would be required in order to meet the legitimate interests described.

Would disclosure cause any unwarranted harm to the individuals?

60. The Commissioner maintains that whilst disclosure would be an intrusion into the privacy rights of the data subjects there is no evidence of harm that would occur, let alone any that might be considered unwarranted.

Commissioner's decision on schedule 2 condition

61. The Commissioner considers that the three part test for the sixth condition has been met. Therefore, section 40(2) is not engaged and the information can be disclosed. The Commissioner requires the DWP to disclose the PAR reports with the names of senior civil servants, but with the names of the junior employees redacted.

Section 17(3) – time for refusal notice

62. Section 1(1) of the Act provides that any person making a request for information to a public authority is entitled:

'(a) to be informed in writing by the public authority whether it holds information of the description specified in the request, and

(b) if that is the case, to have that information communicated to him.'

63. Section 10(1) of the Act provides that a public authority must comply with section 1(1) promptly and in any event not later than the twentieth working day following the date of receipt.
64. Under section 17(3) a public authority can, where it is citing a qualified exemption, have a 'reasonable' extension of time to consider the balance of the public interest. The Commissioner considers it reasonable

to extend the time to provide a full response, including public interest considerations, by up to a further 20 working days, which would allow a public authority 40 working days in total. The Commissioner considers that any extension beyond 40 working days should be exceptional and requires the public authority to fully justify the time taken.

65. The DWP issued a response on 6 June 2016 stating that section 36 was engaged but further time was required to determine the balance of the public interest test. The DWP did not provide the complainant with outcome of the public interest test until 9 November 2016. As the DWP took longer than 40 working days to issue its response to the complainant's request it breached section 17(3) of the Act.

Other matters

66. Upon receiving a request a public authority has a duty to confirm or deny whether it holds information of the description specified in the request. The complainant's request clearly states "*If a project assessment review was carried on the UCP in 2015 please disclose the PARR produced following that review*" yet the DWP did not confirm to the complainant that it held a report for 2015. The DWP confirmed that relevant information was held, but this could have easily referred to the other PAR reports specified. The Commissioner recommends that the DWP is more specific when confirming what relevant information is held.
67. The complainant stated to the Commissioner that in its refusal notice of 9 November 2016 the DWP produced generic arguments that were not specific to the requested information. The DWP's refusal notice states the following:

"We recognise that the publication of all the information requested could provide a greater understanding of the risks, issues and progress steps of the Universal Credit Programme and so help inform a wider public debate.

However, we have to balance this against the fact that the withheld documentation includes details of a sensitive nature whose publication would prejudice the effective conduct of public affairs. There is a strong public interest in the Department maintaining efficient and effective programme management and in ensuring that this process is not undermined by premature disclosure particularly where risks to delivery are not yet fully mitigated.

There is also a strong public interest in the Department being able to carry out and use frank assessments, including unrestrained and candid contributions from business areas."

68. The complainant referred the Commissioner to a section 36 refusal notice the DWP issued to a request for different information some four years ago.⁵ The paragraphs quoted above are there in full. Section 2(2)(b) of the Act requires public interest tests to be made “in all the circumstances of the case”. Reproducing standard paragraphs is not good enough, and the Commissioner recommends that the DWP make future refusals more specific to the information specified in the request.
69. The Commissioner also wishes to note that the DWP delayed providing its submissions to the Commissioner, and it eventually required an information notice to extract a response from the DWP. Whilst the Commissioner is mindful of pressures on public authority resources it is far from satisfactory that a complainant waits six months for a refusal and then his appeal is delayed further by a public authority taking a long time to produce its submissions.
70. When the DWP initially provided its submissions they were not accompanied by the withheld information or the qualified person's opinion. Both are essential for the Commissioner's investigation. In this instance, having sight of the qualified person's opinion and the date it was issued impacted on the public interest arguments the Commissioner considered in reaching her decision.
71. The DWP stated to the Commissioner that “Whilst DWP agrees the ICO may need to see the information used by the qualified person in reaching their decision, we do not agree that the ICO needs to see the documents, particularly Ministerial submissions, to carry out its functions.” The Commissioner has authority under the Act to obtain any information required for making her decision. This includes any qualified person's opinion required for engaging a section 36 refusal. The DWP's assurance that the qualified person has provided their opinion is not sufficient, and the Commissioner must have sight of it and in order to confirm when the opinion was made and whether the opinion is reasonable. The Commissioner expects the DWP to provide the qualified person's opinion as standard and hopes that such matters can be avoided in future.

⁵ https://www.whatdotheyknow.com/request/universal_credit_programme

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: 0300 123 4504

Fax: 0870 739 5836

Email: GRC@hmcts.gsi.gov.uk

Website: <http://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

**Gerrard Tracey
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