

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 11 September 2017

Public Authority: West Mercia Police

Address: PO Box 55
Hindlip
Worcester
WR3 8SP

Decision (including any steps ordered)

1. The complainant requested copies of internal communications from West Mercia Police associated with a previous request he had made. West Mercia Police refused to provide the requested information, citing section 14(1) of FOIA (vexatious request).
2. The Commissioner's decision is that West Mercia Police applied the section 14(1) exemption to this request correctly. She does not require West Mercia Police to take any steps to ensure compliance with the legislation.

Background

3. The Commissioner has issued a decision notice *FS50641978*¹ in relation to a previous request from the complainant, in which he had asked West Mercia Police for information about police searches in Droitwich.
4. The complainant subsequently appealed the Commissioner's decision to the First-tier Tribunal. He then made a further request (as set out in paragraph 6) for recorded information he required concerning his appeal.

¹ <https://ico.org.uk/media/action-weve-taken/decision-notices/2016/1625480/fs50641978.pdf>

5. The Commissioner notes that the complainant's appeal has now been heard and dismissed by the Tribunal which commented: *"Not for the first time when evaluating the case of an appellant, we deplore the aggressive tone of some of [name redacted] correspondence with WMP [West Mercia Police] and his wholly unfounded accusation of dishonesty (Bundle p. 78 10/8/16). It was in marked contrast with the measured and courteous conduct of his oral appeal."*

Request and response

6. On 18 November 2016 the complainant wrote to West Mercia Police and requested information in the following terms:

"I am now appealing against the ICO decision ref FS50641978. I will include a copy of this new FOI request with my appeal along with a copy of any response received from you if received in time.

To enable the Tribunal to better understand the position please provide copies (redacted as necessary) of your internal communications (between 13 June and 5 July 2016) requesting information to enable you to reply to my FOI request ref RFI 7427/16 along with copies of the response you received.

The Tribunal will need to understand the exact parameters of the search requests you made and this will be determined by the wording of the enquires [sic] you made and the wording of the response you received."

7. West Mercia Police responded to the request on 16 December 2016 citing section 14(1), vexatious request, of FOIA.
8. Following an internal review West Mercia Police wrote to the complainant on 28 February 2017. It maintained that section 14(1) applies.

Scope of the case

9. The complainant contacted the Commissioner on 8 March 2017 to complain about the way his request for information had been handled. He commented on what he saw as inadequacies in the police internal review process and said that the review had not been carried out appropriately. The Commissioner has commented on this in "Other matters" at the end of this notice.
10. From the earlier *FS50641978* decision the Commissioner is aware that the complainant has concerns about the way in which the police had been using their powers to search domestic premises, and would like to

establish the facts for himself by way of FOIA requests to reassure himself that police powers were not being abused.

11. The Commissioner has considered whether West Mercia Police was entitled to rely on section 14(1) in relation to the complainant's request of 18 November 2016.

Reasons for decision

Section 14 vexatious request

12. Section 14(1) of FOIA provides that a public authority is not obliged to comply with a request for information if the request is vexatious.
13. The term 'vexatious' is not defined in the FOIA. The Upper-tier Tribunal considered the issue of vexatious requests in the case of *The Information Commissioner and Devon County Council vs Mr Alan Dransfield (GIA/3037/2011) (Dransfield)*² and concluded that the term could be defined as "*manifestly unjustified, inappropriate or improper use of a formal procedure*".
14. The *Dransfield* case identified four factors that may be present in vexatious requests:
 - the burden imposed by the request (on the public authority and its staff)
 - the motive of the requester
 - harassment or distress caused to staff
 - the value or serious purpose of the request.
15. The Commissioner has identified a number of 'indicators' which may be useful in identifying vexatious requests. These are set out in her published guidance on vexatious requests³. In short they include:
 - Abusive or aggressive language
 - Burden on the authority
 - Personal grudges
 - Unreasonable persistence
 - Unfounded accusations

² <http://www.osscc.gov.uk/judgmentfiles/j3680/GIA%203037%202011-01.doc>

³ <https://ico.org.uk/media/for-organisations/documents/1198/dealing-with-vexatious-requests.pdf>

- Intransigence
 - Frequent or overlapping requests
 - Deliberate intention to cause annoyance
16. The fact that a request contains one or more of these indicators will not necessarily mean that it must be vexatious. All the circumstances of a case will need to be considered in reaching a judgement as to whether a request is vexatious.
17. The Commissioner's guidance suggests that if a request is not patently vexatious, the key question the public authority must ask itself is whether the request is likely to cause a disproportionate or unjustified level of disruption, irritation or distress. In doing this the Commissioner considers that a public authority should weigh the impact of the request upon it and balance this against the purpose and value of the request.
18. Where relevant, public authorities also need to take into account wider factors such as the background and history of the request. However, it is important to recognise that one request can in itself be 'vexatious' depending on the circumstances of that request.
19. Section 14(1) can only be applied to the request itself and not the individual who submitted it. The issue for the Commissioner to determine in this case is whether the request of 18 November 2016 was vexatious.

The complainant's view

20. The complainant's request for internal review in the case under consideration here was as follows:

"I request you review this decision. If you do not wish to do so please confirm this so I can then pursue the issue with the Information Commissioner.

Your allegations are deeply offensive. My request is clearly relevant to the matter to be considered in due course by the General Regulatory Chamber and wholly reasonable.

I am copying [name of responding officer redacted] in on this email and ask that she ensures that you provide the material I have requested and that it be included in the bundle for the hearing."

21. The complainant told the Commissioner that:

"The grounds claimed by West Mercia Police for refusing my request are unreasonable, false/distorted and abusive. It is part of an on-going pattern of behaviour which seeks to discredit and rubbish me in a deeply unpleasant manner. Such conduct is seriously inflaming

my symptoms – West Mercia Police have acknowledged to the Information Commissioner that they are aware of my health condition so this conduct appears to be calculated and deliberate.”

West Mercia Police's view

22. West Mercia Police submitted detailed arguments in support of its reliance on section 14(1). In summary, it said it had refused the request as vexatious due to the following:

- *“It is fair to regard the request as obsessive*
- *The request is harassing to the authority or causing distress to its staff*
- *The request is designed to cause disruption or annoyance*
- *The request lacks any serious purpose or value.”*

Obsessive request

23. As set out above, the complainant had requested copies of West Mercia Police's internal communications between 13 June and 5 July 2016 in relation to an earlier request. West Mercia Police said: *“In this instance the force regards the submission of questions surrounding and/or connected to a subject that has already received a ‘no information held’ response as vexatious, in summary, due to the following reasons.”*

24. It explained that an obsessive request can be identified where a complainant continues with a request(s) despite being in possession of other advice, or is still in consultation over the same issue. In this case, West Mercia Police said the complainant has *“openly stated”* that he does not believe that the enquiries/searches West Mercia Police made to try to retrieve the requested information for the previous request were actually made, and that this is the reason he submitted the request under consideration in this notice.

25. West Mercia Police explained that the request is also considered obsessive and designed to cause disruption and/or annoyance as to supply copies of the requested correspondence would not only provide no useful information, as negative responses were returned, but it would also necessitate the redaction of employees' names and internal email addresses and phone numbers, which it said would be: *“a necessary but futile exercise that would serve no useful purpose”*.

26. West Mercia Police said that it considers the request to be obsessive and designed to cause disruption and/or annoyance because information about the searches it undertook, in January 2016, to respond to the initial request is already in the public domain, specifically:

“A Police Officer reviewed the search registers held at Worcester Police station as all search registers for the local policing area which

included Droitwich are held there. In addition to manually reviewing the search registers, which produced a nil return for January 2016, the Officer had made contact with colleague Departments in order to establish if there were any electronic recording systems that could be searched to find the information requested.

The search registers were reviewed manually for all searches of anything that constituted a building. The relevant search register was interrogated for all searches, including warrants executed for the month of January 2016 for the area of Droitwich. These searches too produced a nil return. Additional enquiries were made within the force to also check if any other electronic recording/reporting systems held the information in an electronically searchable format- these enquiries produced a negative response."

Serious purpose or value

27. West Mercia Police told the Commissioner that: *"Further provision of more specific information regarding internal communications regarding the searches that were conducted would serve no purpose as the outcome would still be the same ie no specific recorded information is held in relation to [the previous request]."*
28. West Mercia Police argued that the request is considered to lack any serious purpose or value because it had already responded to the complainant's previous request (police searches) and advised him that no specific recorded information is held, which was upheld at internal review and by the Commissioner, and at the subsequent Tribunal appeal.
29. It also said that the provision of internal correspondence used to determine its stance in response to the complainant's previous request: *"would have no serious purpose or value as it would not elicit a different outcome for disclosure."*
30. Additionally, West Mercia Police advised that the work involved in locating, redacting (for personal information) and providing the requested internal communications *"would have no value"* and is considered *"a disruptive burden to the force and the disclosure/response that would be provided would not be proportionate to the end product being in the public interest"*.

Wider history and context

31. West Mercia Police advised the complainant, in line with the Commissioner's guidance, that a request in isolation may not appear vexatious, but if it is the latest in a series of overlapping requests or other correspondence then it may form part of a wider pattern of behaviour that makes it vexatious.

32. It said it believes that compliance with the request under consideration in this notice, or others on the same subject matter, and the provision of any relevant information: *"would be used as a basis to submit further FOI requests and/or extend existing grievances which would lead to further expense and distraction to the force"*.
33. West Mercia Police explained that the complainant has submitted 12 requests in seven months (May to November 2016), three of which were submitted within three and a half hours of each other on the same day. It said that the complainant had requested internal reviews for five of those requests, further complained to the Commissioner about six of the requests and appealed one request to the Tribunal, which ruled against him. It stated: *"this is despite the assertion on behalf of the applicant that corresponding with West Mercia Police (WMP) poorly affects his health."*
34. West Mercia Police highlighted that it does not initiate contact with the complainant, rather its contact is in response to correspondence from him. It said: *"The applicant repeatedly advises that any contact with the force inflames his health issues and makes him feel suicidal yet chooses to continue"*.
35. It added: *"The tone and content of some of the applicant's submissions to the force are deemed to be provocative and accusatory", and he "repeatedly makes unfounded allegations against members of the ICU [Internal Compliance Unit]...in which the applicant claims that ICU members are deliberately being unhelpful and obstructive to him, that ICU members have personal animosity towards him and that ICU members seek to inflame his health symptoms. These claims are false and unsubstantiated, in addition to being personal, defamatory and spiteful – having the effect of harassing the public authority and its staff"*.
36. West Mercia Police provided the Commissioner with specific examples of the complainant's tone and language adopted throughout the course of his various requests. For example, in May 2016, the complainant submitted his initial request about a warrant that West Mercia Police had executed at an individual's address, where he referred to beliefs he had attributed to a Superintendent and, more generally, to the force itself, stating: *"the Police will have a 'couldn't give a damn attitude"*. West Mercia Police said this request: *"appears to have been submitted to gain information in relation to another individual's perceived grievance and to elicit information that would prove wrong doing by the force."*
37. The complainant submitted his second request on 13 June 2016, an hour and a half after receiving West Mercia Police's response to his initial request, which the complainant stated was: *"deliberately unhelpful"*. West Mercia Police's response advised that no information was held; the

complainant stated: *"Given that West Mercia Police appear to be intent on being as obstructive and unhelpful as possible, it appears I need to submit further requests in order to eventually obtain the information I am seeking."*

38. West Mercia Police advised that the complainant submitted 11 pieces of correspondence following the response to the second request, in which he made the following comments:

"I also wish to give you notice that I continue to find your conduct towards me deeply offensive and malicious. I feel harassed by your conduct which you continue to pursue despite being aware of my health condition. This is wholly unacceptable. Please arrange for someone to acknowledge my complaint about your personal conduct towards me and how they intend to deal with it."

"...if you refuse to respond to this email or continue with your wholly unhelpful, obstructive and offensive approach then I will clearly need to submit such a further request".

"You effectively stick two fingers in the air at me in a most offensive manner and tell me to complain to the Information Commissioner."

"Madam, your conduct is vile in the extreme and clearly intended by you to be deeply offensive in the full knowledge of the detrimental impact such conduct will have on my health."

39. The complainant submitted his third, revised request on 6 July 2016, having received West Mercia Police's response to his second request. On 15 July 2016 he asked to extend the search parameters of that third request, which West Mercia Police refused as the searches on his original parameters had already been undertaken, and to do so would have required additional work. As part of its subsequent response, West Mercia Police set out the criteria for vexatious requests.
40. The complainant submitted a fourth request on 22 July 2016 about police searches of premises reported by the media and advised that he: *"should not need to make FOI requests in order to obtain information about West Mercia Police searches or the way in which West Mercia Police involve the media when conducting searches. Such information should be readily available on the West Mercia website albeit in a suitably summarised and redacted form"*.
41. On 12 August 2016, the complainant made his fifth request asking for the information within the extended parameters which West Mercia Police refused in his third request (as it would have required additional work to be undertaken). In this request, the complainant refers to the police stating they: *"assert the right to show callous indifference to the fear and distress caused by such conduct"*.

42. He also made the following comment about West Mercia Police's ICU:

"I am pursuing a wholly legitimate and well founded concern. It is wholly inappropriate for you to subject me to abuse for doing so. Accusing me of being vexatious and with such a poisonous and intimidating undercurrent to all communications in full knowledge of my health condition is highly abusive and offensive and is deliberately designed and intended to inflame my stress/anxiety related health condition."

43. West Mercia Police initially refused this request as a repeat request (section 14(2) of FOIA), but reviewed its position to 14(1), vexatious request, following the complainant's complaint to the Commissioner. The complainant responded with:

"It is the conduct of [employee A's name redacted] that is vexatious as she knows there are no reasonable grounds for her claim. Her intention in making her claim is to cause me stress and distress and to inflame the suicidal feelings she knows I am experiencing. It is aggressive conduct of a particularly unpleasant nature."

This is demonstrated in part by her sarcastic comments that 'she hope[s] this is of assistance to me'.

[Employee's name redacted] has failed to provide any reasons for her decision to switch to 14(1) grounds. It is just naked 'in your face' aggression."

44. The complainant submitted another two requests on 12 August 2016, which included further comments about the same officer:

"With respect, [employee's name redacted] is clearly ignoring the actual request that I made. [Employee A's name redacted] normally details the enquiry when responding to requests. She has not done so on this occasion as she knows she is deliberately ignoring the question. I am making a simple and reasonable request and your continued conduct and attitude towards me on response continues to be offensive and wholly unreasonable."

45. The complainant also made what West Mercia Police have described as "defamatory personal comments" about another of its officers, including:

"These should include the provisions [employee B's name redacted] relies on when a) handling reviews herself rather than allowing them to be considered by your appeal panel; b) when wholly ignoring the issues raised in the complaint and c) when refusing to even look at the content of the complaint letter."

46. Between August 2016 and November 2016, the complainant submitted another four requests relating to police searches, a previous request and a copy of a named officer's job role profile. He also said:

"Until such time as West Mercia Police choose to publish information on a voluntary basis via its website, I wish to raise FOI requests every 3 months (so in excess of 60 working days) relating to the three calendar months prior to the request."

47. West Mercia Police said that this statement reflects the complainant's intention to use the FOI legislation to submit further requests *"to further his campaign"*.

48. West Mercia Police also explained that in addition to the negative and defamatory correspondence, the complainant includes *"unfounded allegations and derogatory comments to other departments and outside agencies"* such as that contained his correspondence of 16 September 2016:

"...instead implying that I am stupid by highlighting the link to the ICO guidance for 'ease of reference' is deeply offensive and inflammatory. I am sure they are well aware of what they are doing and this impact on me is wholly intentional".

"[Employee A's name redacted] is wholly obstructive and clearly in breach of the section 16 duty to provide advice and assistance".

"The address for the ICO website is incorrect. I am sure "[employee's name redacted] is aware of this. It is further evidence of a deliberate intention to be obstructive."

[To the IPCC in September 2016] *"It is wholly unacceptable for Supt [name redacted] to allow or instruct his team to lie to you in this way and he should be held to account for it. The conduct of his team has caused me to experience severe suicidal feelings."*

"The harassment I am being subjected to is continuing and on-going."

"I am tired and worn out by the malice and dishonesty Supt [name redacted] and his colleagues insist on subjecting me to. AND NOTHING IS DONE ABOUT IT. It just continues year after year! And my health continues to deteriorate. I am strongly opposed to suicide and hope and trust I will never succumb to the severe feelings I am subjected to. But I suspect I will die from some stress related illness. I am only [age redacted] but feel like an old man. I have not undertaken paid employment for what is now almost six years because of my health problems and the problems caused by West Mercia Police."

*"[Employee B's name redacted] assertion to the **Information Commissioner** that I have been KNOWN to the Police since 2001 and have been communicating with West Mercia Police on a regular basis since 2001. Her allegation is a lie, she knows it is a lie but she could not care less."*

"How can I attempt to gain employment when [Employee B's name redacted] and her colleagues are determined to make me out to be a hardened criminal whose very existence is deeply offensive to them. They regard the mere fact that I am breathing as scandalous behaviour and an act of harassment against them."

"I cannot handle their sheer hatred and malice towards me."

"This letter of 28 February is a further example of this vague, generalised smear campaign against me. I am sick of it. It is making life unbearable for me. It makes me very reluctant to open any communication from them or linked to them for fear of what further abuse and malice it may contain. I do not want to be sent over the edge."

49. West Mercia Police stated that the foregoing provides evidence that the request of 18 November 2016 forms a series of connected and overlapping requests, and is vexatious because to fulfil the request at the time of receipt would create a burden in terms of distraction as information for the previous request had already been searched for and no information found. To provide the information then requested would require duplication of effort by someone having to revisit and review all the correspondence associated with the earlier search process. This was explained to the complainant who complained to the Commissioner, causing further disruption for West Mercia Police.

50. It said the request can fairly be characterised as obsessive as it was submitted as part of a series of requests, and because the complainant has openly stated he does not believe West Mercia Police have carried out the searches before responding to his earlier request.

51. West Mercia Police said:

"The applicant is misusing and abusing the Act by submitting requests which are disruptive and which have a disproportionate impact on the public authority. The applicant makes reference to how he will use the Act to submit further FOI requests should he be dissatisfied with information provided to him, and also makes reference to the intention to submit requests should the authority not publish information he believes should be published."

52. It explained that dealing with the complainant's requests and the unreasonable amount and type of correspondence that accompanies

them places a strain on resources and gets in the way of delivering mainstream services and answering legitimate requests. It said the amount of time spent reviewing the complainant's correspondence, complaints and requests for internal review, in addition to corresponding with the Commissioner about complaints escalated by the complainant, means that resources - which are already limited - are taken up with the needs of one applicant instead of providing a service to the wider public.

53. West Mercia Police said that section 14(1) is also designed to protect public authorities by allowing them to refuse any request which has the potential to cause disproportionate or unjustified distress: *"This is evidenced by the abusive and aggressive tone, language and unfounded allegations included within much of [the complainant's] correspondence."*

54. West Mercia Police stated:

"The tone and personal accusations included in the requester's correspondence goes beyond the level of criticism that a public authority or its employees should reasonable expect to receive including comments that intimate personal grudges – the requester is targeting their correspondence towards particular employees against whom they seem to have some personal enmity. In addition to this the applicant is making unfounded accusations. The applicant makes completely unsubstantiated accusations against specific employees. And also bases request on trying to elicit information to challenge the authority for alleged wrongdoing without any cogent basis for doing so."

The Commissioner's view

55. The Commissioner has carefully considered the arguments put forward by West Mercia Police and the complainant before reaching her decision in this case.
56. From the correspondence she has seen, it is clear to the Commissioner that the complainant is not satisfied with West Mercia Police and how it conducts itself.
57. The Commissioner is mindful that the context and history of a request is not the only factor to consider when determining whether a request is vexatious. The Commissioner will also consider the purpose and value of the request and the detrimental impact on the public authority which receives it.
58. The Commissioner is also mindful that the complainant states that he has a stress related condition and that he has made reference to *"suicidal feelings"*. However, she has balanced this against the wider context and the tone and language used on occasions by the

complainant. She also notes West Mercia's statement that it only contacts the complainant in response to correspondence and requests he has submitted.

59. The Commissioner recognises that public authorities must keep in mind that meeting their underlying commitment to transparency and openness may involve absorbing a certain level of disruption and annoyance.
60. The burden on West Mercia Police in this matter arises principally from the resources and staff time that they have been spending on addressing the complainant's information requests.
61. The Commissioner considers that the background and history of the request are of particular significance in this case. In the circumstances, the Commissioner considers that the pattern of behaviour, including the number, tone and frequency of connected information requests, made to West Mercia Police cannot be overlooked. She considers that this background is relevant to West Mercia Police's arguments in support of its application of section 14 in this case.
62. The Commissioner considers that, given the wider context in which this request was made and the complainant's clear grievance with West Mercia Police, it is reasonable to believe that the complainant will continue to submit requests and/or maintain contact about the subject matter regardless of any response provided to the request in question. This view is reinforced by the complainant's stated intention to keep making further FOIA requests to secure the information he is seeking.
63. The FOIA provides fundamental rights to the public to request access to recorded information held by public authorities. It should not be used to vent dissatisfaction with matters which have already been, or are still in the process of being, dealt with.
64. In this case it is not difficult for the Commissioner to conclude that the complainant's request is unreasonably persistent, and that the effect of the request is to cause a disproportionate or unjustified level of disruption, irritation or distress to the force concerned.
65. Further, as the complainant's related appeal to the First-tier Tribunal has already been heard and dismissed, there is little, if any, value in the complainant securing copies of West Mercia Police's internal communications associated with his earlier request which was the subject of that appeal. Indeed, if the information requested here was necessary for that appeal then it would have been included as part of the bundle for consideration.

Conclusion

66. In view of the above, the Commissioner's decision is that the complainant's request of 18 November 2016 is vexatious. She therefore finds that West Mercia Police was entitled to rely on section 14(1) of FOIA.

Other matters

67. Internal reviews are not a statutory requirement; instead they fall under part VI of the Section 45 Code of Practice, which recommends that public authorities have a procedure in place for dealing with complaints about their handling of requests for information, ie an internal review process, and that the procedure should encourage a prompt determination of the complaint. However there is no definitive form that the internal review process must take.
68. The Commissioner's guidance⁴ on internal reviews includes the following point: "*ensure the review is done by someone who did not deal with the request, where possible, and preferably by a more senior member of staff*".
69. West Mercia Police and Warwickshire Police have a shared team responsible for processing information requests made to either force. This arrangement does not alter the fact that these two forces are separate public authorities for the purposes of the FOIA. The Commissioner also notes that West Mercia Police does not appear to have a written procedure for internal reviews, but that it follows 'national guidance'⁵.
70. On West Mercia Police's website under its disclosure log⁶ there is a link under the heading 'College of Policing Authorised Professional Practice for Freedom of Information, including internal reviews and appeals'⁷: This link includes the following statement:

⁴ <https://ico.org.uk/for-organisations/guide-to-freedom-of-information/refusing-a-request/>

⁵ [https://www.westmercia.police.uk/media/12907/Freedom-of-Information-Act-Harmonised/pdf/FOI_Policy_\(Harmonised\).pdf](https://www.westmercia.police.uk/media/12907/Freedom-of-Information-Act-Harmonised/pdf/FOI_Policy_(Harmonised).pdf)

⁶ <https://www.westmercia.police.uk/disclosure-logs?foiid=22343>

⁷ <https://www.app.college.police.uk/app-content/information-management/freedom-of-information/>

“The internal review stage is an opportunity to consider a request completely afresh. It should be an independent review of the original decision. This process should not be overly bureaucratic. The force must issue a fresh response, compliant with FOIA section 17 if appropriate.”

71. Whilst the complainant said he did not object to the review being carried out by an officer of Warwickshire Police, he expressed concern that a Board (consisting of a Head of Department and a Chief Officer) had not reviewed his request in line with Warwickshire Police's written internal review procedure. However, as the request was made to West Mercia Police who do not have a written procedure for internal reviews, the Commissioner is satisfied that there was no requirement for the 'Board' to review the complainant's request.
72. In the case under consideration in this notice, the Commissioner is satisfied that the internal review was carried out by an independent individual and that it complies with both the College of Police's and the Commissioner's own guidance.

Right of appeal

73. 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

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

74. 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.
75. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed

Carolyn Howes
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