

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 3 August 2018

Public Authority: Wark Parish Council
Address: c/o The Haining,
Wark,
Hexham,
NE48 3ED.

Decision (including any steps ordered)

1. The complainant has requested information relating to council minutes, background information for council meeting and council accounts. The council refused the request on the grounds that the requests were vexatious and fall within the scope of the exemption in section 14 of the Act.
2. The Commissioner's decision is that the council was correct to apply section 14 to the request. However she has also decided that the council failed to comply with the requirements of section 10(1) in responding to the complainant's request in that it did not inform him of its response within the 20 working days as required by that section.
3. The Commissioner does not require the council to take any steps.

Request and response

4. On 13 June 2017 the complainant made a request for information under the FOIA in the following terms:

"In the absence of the publication of the draft minutes of the meeting of Wark Parish Council on 3 May 2017 I am requesting a copy under the Freedom of Information Act."

5. On 24 June 2017 the complainant also made the following request for information under the FOIA for:

"In the absence of the publication of the draft minutes of the meeting of Wark Parish Council on 22 May 2017 I am requesting a copy under the Freedom of Information Act."

6. On 8 July 2017 the complainant also made the following request for information under the FOIA for:

"I repeat my request for a copy of the minutes of the council meeting of 22 May 2017 under the FOIA."

I note that the minutes of the meeting of 3 May 2017 have now been published but the supporting documents are missing from the web site, in contravention of statutory requirements. Please supply these under the FOIA.

The minutes of the meeting of 26 April 2017 have similarly been published without the supporting documents so please provide me with a copy of these. In particular the BDO report was not tabled nor was it properly included as an agenda item (see below), despite my request to you for a copy before the meeting took place."

Contrary to statutory requirements, the BDO report for 2015/2016 was not included as an agenda item for discussion in public session. Please explain the reason for this omission so that I can decide whether to make a formal objection to the 2016/2017 accounts in relation to this failure.

I note that the minutes of 26 April 2017 have been published in approved form despite the fact that they were not approved at the meeting on 3 May 2017 or 22 May 2017. Please clarify the reason for this error.

7. There followed further emails from the complainant in which further FOI requests and allegations were made that the council was not following correct procedures.

8. The council responded to the complainant on 25 October 2017. It said that the requests were vexatious and applied section 14 of the Act (vexatious).
9. The council did not provide an internal review of its decision but referred the complainant directly to the Information Commissioner to make a complaint.

Scope of the case

10. The complainant initially contacted the Commissioner on 25 August 2017 to complain about the way his request for information had been handled. This initial complaint related to the council's failure to respond to his requests for information at all. As noted above, the council subsequently responded to the request in October by stating that section 14 of the Act applies.
11. The Commissioner considers that the complaint is that the council was not correct to apply section 14 to the request.
12. The Commissioner notes that the minutes of meetings required by the requests have subsequently been published by the council on its website. As such these are now available to the complainant and section 14 is not specifically required to be considered by the Commissioner in this respect. However other information has not been provided to the complainant such as the requested background papers to some meetings.
13. The issue for the Commissioner in dealing with this complaint is therefore the application of section 14 of the Act to the complainant's requests for information of 8 July 2018.
14. The decision notice also considers the time which the council took to respond to the requests and whether this complied with the requirements of section 10(1) of the Act.

Reasons for decision

15. Section 14(1) of FOIA states that section 1(1) does not oblige a public authority to comply with a request for information if the request is vexatious. There is no public interest test.
16. The term 'vexatious' is not defined in the legislation. In *Information Commissioner v Devon County Council & Dransfield*¹, the Upper Tribunal took the view that the ordinary dictionary definition of the word vexatious is only of limited use, because the question of whether a request is vexatious ultimately depends upon the circumstances surrounding that request. The Tribunal concluded that 'vexatious' could be defined as the "...manifestly unjustified, inappropriate or improper use of a formal procedure" (paragraph 27). The decision clearly establishes that the concepts of 'proportionality' and 'justification' are central to any consideration of whether a request is vexatious.
17. In the Dransfield case, the Upper Tribunal also found it instructive to assess the question of whether a request is truly vexatious by considering four broad issues:
 - (a) the burden imposed by the request (on the public and its staff);
 - (b) the motive of the requester;
 - (c) the value or serious purpose of the request; and
 - (d) and harassment or distress of and to staff.
18. The Upper Tribunal did, however, also caution that these considerations were not meant to be exhaustive. Rather, it stressed the

"importance of adopting a holistic and broad approach to the determination of whether a request is vexatious or not, emphasising the attributes of manifest unreasonableness, irresponsibility and, especially where there is a previous course of dealings, the lack of proportionality that typically characterise vexatious requests" (paragraph 45).

¹ UKUT 440 (AAC) (28 January 2013)

19. The Commissioner has also identified a number of “indicators” which may be useful in identifying vexatious requests. These are set out in her published guidance on vexatious requests². 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.
20. Following the above, the Commissioner essentially needs to consider whether the request is likely to cause a disproportionate or unjustified level of disruption, irritation or distress in relation to the serious purpose and value of the request.
21. The Commissioner has therefore considered the councils arguments in respect of the factors listed above. When doing so she has borne in mind that the requests for information in this instance are, for the most part, for information which she would expect to be included within the council’s publication scheme, and/or published as a matter of course. Whilst this is the case, public authorities are still able to apply section 14 to such requests where the requests fall within the criteria set out above.
22. The council’s argument is not that these particular requests are overly burdensome. Its argument is that the request follows a long history of similar behaviour by the complainant, and when seen in this context, the requests are vexatious.

a): The burden imposed by the requests

23. The council argues that it is a small parish council overseeing a rural area. The Commissioner notes that its precept is around £10 000 per annum, and that its clerk works a total of 4 hours a week.
24. The council argues that it has had a long history of issues with the complainant making a large number of requests and other correspondence with the council prior to these current requests being received. It argues that the burden these requests have made has led former clerks to resign from their post and caused significant disruption to the council’s ability to carry out its functions.

² <https://ico.org.uk/media/for-organisations/documents/1198/dealing-with-vexatious-requests.pdf>

25. It is important to note that the complainant's correspondence with the council has not all been requests for information. He has been in correspondence over a wide number of issues, including procedural errors which he considers the council has made, and he has also taken up issues with the council's external auditors, BDO on a number of occasions, which have resulted in additional costs and work for the council.
26. The council's argument is that this history of correspondence from the complainant has placed the council, as a small parish council with very limited resources, into a position where dealing with his requests creates a disproportionate burden compared to the value and purpose of the requests. It also considers that the request is part of a pattern of behaviour designed to harass and annoy members and officers of the council.
27. The council has provided some evidence to the Commissioner in respect of these claims, although it is noted that the complainant disputes the numbers of request he has made previously.
28. A statement of the council Vice-Chair was provided to the ICO and which stated:

"...between 6 August 2014 and 11 January 2016 (17 months) I received 373 emails on a wide range of subjects. However, this is not reflective of the actual number as I kept only the latest in any trail of question/response/chasing up emails, so the actual number would be very much higher: I could only guess that each retained email was the last of at least 3 others, possibly more. I received 32 between 17 December 2015 and 11 January 2016 alone; this was when I told him I would not respond to emails and I read none of them. Previously, between 7 September and 15 December 2015 I had received and read 40 (remember that there would have been more due to the trails of messages that I deleted).
29. The council vice chairman further claimed that he had a folder over 1 inch in thickness of emails from the complainant.
30. There has also been local press coverage of the dispute between the council and the complainant which specifically refers to the amount of correspondence which the complainant sent to the council previously (in 2015). The Commissioner notes that the complainant disputes the numbers of requests which the council quoted within this article and argues that the actual number of request was substantially lower than that quoted by the council. The Commissioner has not provided a link to this coverage as it would identify the complainant.

31. At that time the complainant also made a complaint to the council regarding the actions of one of its former clerks, and he also suggested that the chair should resign her post given issues with the council following correct procedures.
32. The Commissioner notes that prior to receiving these requests the council has previously sought to restrict the complainant's means of communication to recorded delivery post. The council informed the complainant that due to the burden his correspondence was placing on the clerk and councillors it was restricting his ability to contact the council to this means only, and would ignore or delete emails which it received from him. It argued that it had taken this step in order to protect the clerk from further burdensome correspondence.
33. As a result of this it also did not publish contact details for the current clerk and current councillors on the parish council website, although at the time of making this decision the Commissioner notes that the council does now provide a contact email address for members of the public to contact the council.
34. Whilst the complainant has sent these further requests by email he argues that as he spends much of his time abroad the current restrictions set by the council effectively prevents him from making requests when he is not in the country.
35. The Commissioner notes the council arguments that the complainant's requests and emails are numerous and would, overall, require a significant degree of time to provide the information concerned. She does not accept that the individual requests in this case were overly burdensome, however she notes that this does follow a past history of a significant number of emails, queries and requests being received which have, overall, been disproportionately burdensome given the size and resources of the council.

(b) The motive of the requestor

36. The Commissioner notes the complainant's stated motive for making the requests. He argues that the council is not transparent, and that it does not follow correct procedures. He argues that his requests are simply a means of scrutinising the council and that his further correspondence is a way of informing them when they have not acted correctly or according to their own procedures.
37. The Commissioner notes that this current request forms part of a very long running dispute. The Commissioner recognises that in the past there has been a breakdown in the relationship between the parties, and

that this has led to an antagonistic relationship between the council and council members, and the complainant.

(c) the value or serious purpose of the request

38. The key question for the Commissioner to consider in this respect is whether the purpose and value of the request provides sufficient grounds to justify the distress, disruption or irritation that would be incurred by complying with that request. The Commissioner must judge this as objectively as possible. In other words, would a reasonable person think that the purpose and value are enough to justify the impact on the authority of responding to the request? This however needs to be read in context of the whole set of circumstances surrounding the parties in this case.
39. The complainant's argues that there have been issues regarding the council following procedures correctly and that it is not acting transparently. In his initial complaint to the Commissioner he outlined the following issues as regards its current procedures and practices:
- a. *"Wark Parish Council have, since the election in May 2017, failed entirely to provide contact details of five of their seven councillors to the general public. They have instead provided a common non-confidential email address in lieu of normal information such as a contact address, telephone number or personal confidential email address.*
 - b. *No register of interests has been displayed publicly by five of the seven councillors on the council's web site.*
 - c. *The council have failed to provide proper contact details for their clerk and Responsible Financial Officer, indicating that the post is vacant on the council's notice board but providing a name but no contact details of a supposed incumbent on their web site.*
 - d. *The council have failed over an extended period to provide information on their web site which they have a statutory requirement to do, relating to copies of approved minutes and documents concerning matters itemised in agendas of meetings. Some copies of minutes have been wrongly identified as being approved when they have not been formally adopted by the council.*
 - e. *A substantial amount of financial information which should have been disclosed on the council's web site as part of the statutory audit process for the 2016/2017 financial year remains unpublished.*

f. Draft minutes of the council's meetings have regularly not appeared within the statutory period required and the council's Standing Orders in this respect are imprecise and do not clearly follow the statutory requirements.

g. The council has infringed my statutory rights in insisting that I (alone amongst all other local residents) should communicate by mail rather than by electronic means."

40. The Commissioner has not investigated these issues as they fall outside of the scope of the Commissioner's jurisdiction. She does note, however, that the council does now provide some of the referenced information on its website, albeit that that information may not have been published at the time that the requests, or the complaint to the ICO, were made.

41. She also recognises that some of these issues may have arisen as a result of the council taking action to minimise the burden on the clerk or on councillors following the persistent correspondence from the complainant previously. Almost certainly, its failure to provide the email addresses of the clerk and some councillors is due to the previous history of correspondence which it has received from the complainant.

(d) Harassment or distress of and to staff

42. The council argues that continued correspondence from the complainant has placed the former and current clerks and some councillors under a great deal of stress. It argues that the pressure previously created by the number of requests and other correspondence from the complainant previously has led to a number of clerks resigning their posts, (although the complainant has suggested that there were other reasons for these individuals resigning).

43. It has provided correspondence demonstrating the effect which the continued correspondence and request from the complainant has had on the council.

44. The July 2017 minutes of the council also shows the following entry³:

³ <http://www.wark-pc.org.uk/meetings/meetingdocs/minutes/20170827-20-20.Wark%20Parish%20Council%20Minutes%2031.07.17%20DRAFT.docx>

"The Parish Clerk advised that she is reluctant to provide her personal address on the Parish Council or Northumberland County Council websites due to current issues with a vexatious complainant and did not want to receive large amounts of correspondence to her home address or her partner's address.

Councillors discussed and agreed that no personal details would be made available."

45. The complainant also emails councillors directly, including using their own personal private email addresses in spite of being asked to use the preferred method of contact which was provided to him by the council. For his part the complainant argues that these procedures have been applied only to him and that this puts him at a disadvantage to other members of the public when seeking to scrutinise the actions of the council.
46. The council said that it has previously contacted the police regarding harassment from the complainant and his use of private email addresses to question the council and councillors further. The council said that the police suggested that private contact details of councillors were removed from its website and this is what it had done.
47. In September 2017 the council contacted the Commissioner seeking advice as to how to manage the influx of correspondence and requests it was receiving from 'a member of the public'. It stipulated that this was creating a disproportionate burden on the clerk and councillors and was preventing the council from carrying out other important functions and from dealing with 'urgent ongoing problems'.
48. The complainant provided an undated copy of correspondence which he had emailed to the council regarding the clerk's failure to respond to his emails. He wrote:

"I am writing to you to follow up a response to my email dated 7 July 2017, to which I have not had the courtesy of acknowledgment, let alone a substantive response.

Please note that I am copying this email to the Chairman and Vice-Chairman of the Council as you continue to appear not to be prepared to afford me the normal courtesy of acknowledging my communications in any way. Please note that the unlawful decisions of the Council regarding dealing with my correspondence does not remove your duty of dealing with correspondence from all members of the public in an even-handed manner. I am also sending a copy to the Council's external auditors because the Council is failing to respond to recommendations made by that organisation.

I note your refusal to allow the Council to publish your address or telephone number on its web site because of supposedly "vexatious" communications from a member of the public. I fail to see how this action addresses such an issue nor why you seem to think refusing to respond to me assists the situation. You are the first of the four clerks to the Council that I have communicated with over the last four years who has not had the common courtesy to reply to my emails. Regardless of what you have been informed by the Chairman and Vice-Chairman about past history, your attitude is inexcusable. Such behaviour will not make the issues I am raising disappear, indeed the opposite is true."

49. The Commissioner notes that the passive aggressive nature with which the complainant addressed the clerk would have had the effect of causing annoyance and harassment, particularly as the council has specifically accepted her concern about her personal details given the actions of a vexatious complainant previously. The Commissioner considers that this email was sent as a means to pressurise the clerk into responding to his emails and provide her direct contact details to him.
50. The Commissioner further notes two emails sent to the clerk when she was newly appointed. Again these were provided to the Commissioner by the complainant himself. She understands that emails were dated 16 and 17 May 2017. The emails stated:

"Annual Meeting of the Parish Council and Annual Parish Meeting

I am writing further to my previous email sent yesterday regarding the next scheduled meeting of the Parish Council. For the sake of good order I am sending a copy of this email to the County Councillor, the NALC, external auditors and to the previous chairman and vice-chairman in the absence of any newly elected officers.

I note from the Parish Council notice board and the PC web site that there is to be a meeting of the council on 22 May 2017. This meeting is in contravention of statutory provisions in that, as noted on the council's agenda for the meeting held on 3 May 2017, the meeting should have been held no later than 18 May 2017.

The notice is identified as having been produced by the Chairman of the Parish Council rather than yourself in your capacity of the council's proper officer. As you will be aware there is no chairman in office until the scheduled meeting at which an election for the position will take place. The meeting has therefore not been called in accordance with statutory practice and the outcome of the meeting could be held to be invalid.

I also draw your attention to the fact that the agenda fails to include an item for approval of the draft minutes of 26 April 2017 and 3 May 2017. The minutes of the meeting of 26 April 2017 should have been brought before the council by 18 May 2017 at the latest under the council's standing orders. Good practice also dictates that both sets of minutes should have been put before the council at the meeting scheduled for 22 May 2017 regardless of any time constraints included in the standing orders.

Furthermore, the agenda for the council meeting on 22 May 2017 wrongly includes an item for accepting the minutes of the Annual Parish Meeting held on 1 June 2016. Those minutes can only be accepted at a properly convened Annual Parish Meeting which is required to take place by 1 June 2017, with three clear days' notice being provided. It is necessary for the notice for the meeting of 22 May 2017 to be amended to include the Annual Parish Meeting if its minutes are to be approved. If this is done before midnight today there can still be three days' notice given to the public.

I note, once again that the appropriate supporting documents for the agenda for the meeting on 22 May 2017 have not been included on the PC web site, contrary to the provisions of the report of the external auditors. I note that the chairman's report is to be presented at the Parish Council meeting on 22 May 2017. That is contrary to established practice as the report has previously been presented at the Annual Parish Meeting.

I wish you well in your new post. However, I do find it extraordinary that you have been put in the embarrassing position of having to deal with a succession of fundamental procedural errors. With only two experienced councillors on the new council this situation is particularly regrettable."

And

"Next meeting of Wark Parish Council

Please advise when the next meeting of Wark Parish Council has been scheduled and where it is to be held.

The council has a statutory duty to hold the meeting within 14 days of the election, i.e. on 18 May 2017 at the latest. Due notice should have appeared on the Council's web site. I note also that none of the details of the councillors or clerk have been updated on the web site. The minutes of the meeting of 16 April 2017 are also due tomorrow, requiring publication in draft form "at the latest within three weeks

after the meeting” according to the council’s own standing orders and the Transparency Code.

I should point out that the council’s standing orders are dated November 2016 and filed as January 2017 on the web site. To my certain knowledge the updated document has not yet been formally adopted by the council and the previous version of the document should not have been replaced on the web site.

I look forward to clarification on these issues.”

51. The Commissioner notes that although these emails do not, for the most part, make FOI requests, they point out procedural errors with the councils and the clerks actions, and again can be read to be of a passive aggressive nature, copying in various parties to increase pressure on the clerk to take urgent action to rectify the faults the complainant has identified. They are again likely to increase the burden on the council and the clerk overall. The Commissioner considers that the result of receiving such emails would have been an increase in the feelings of harassment, annoyance and distress by the clerk and by other council members.
52. The council said that the complainant has further sent a number of questions and been in correspondence with the council’s external auditors, BDO, resulting in high audit costs being placed upon the council. It also added that previous complaints he has made on requests have led to both Upper and First-tier tribunal appeals. It said that he has also made a number of reports to Northumberland County Council’s Monitoring Officer regarding the council or the actions of councillors in the past.
53. The Commissioner has also received correspondence from a county councillor who wrote to the Commissioner to outline some of the issues which he has witnessed as regards the previous actions of the complainant. The councillor stresses that in some regards some of the complainant’s complaints may have merit, but he argues that, overall, the complainant’s actions and requests have caused a significant burden on the council which overrides any minor infringements on procedure etc.

Conclusions

54. The Commissioner's guidance on the application of section 14(1), at page 37, refers to requests which are vexatious only when viewed in context. It outlines the first tier Tribunal decision in the case of *Betts vs ICO, (EA/2007/0109 19 May 2008)* and reports that:

"..the request concerned health and safety policies and risk assessments. There was nothing vexatious in the content of the request itself. However, there had been a dispute between the council and the requester which had resulted in ongoing FOIA requests and persistent correspondence over two years. These continued despite the council's disclosures and explanations.

Although the latest request was not vexatious in isolation, the Tribunal considered that it was vexatious when viewed in context. It was a continuation of a pattern of behaviour and part of an ongoing campaign to pressure the council. The request on its own may have been simple, but experience showed it was very likely to lead to further correspondence, requests and complaints. Given the wider context and history, the request was harassing, likely to impose a significant burden, and obsessive."

55. The question for the Commissioner is whether the current request can be considered to be vexatious given the nature of the requests and the context within which they were received. The Commissioner notes the complainant's concerns that the council has issues with its transparency, and that it is, or was, failing to publish information which it would otherwise be expected to publish. The Commissioner is satisfied that the council does need to take further action to ensure that information is available to the public. Core information such as the 'declaration of interests' forms of councillors and council minutes should be published and updated by councils on a regular basis, and form part of the process of allowing scrutiny of council decisions and ensuring that democratic probity is maintained.
56. She is also satisfied that, in part, the councils responses to the complainant are coloured by the breakdown in the relationship between the parties, leading to a degree of intransigence where requests have been made by him in the past. The Commissioner has previously issued a decision notice where this issue was considered between these two parties (decision notice FS50662278)⁴. In her analysis in that case she found that the council had failed to comply with section 16 in that it had failed to provide advice and assistance to the complainant in formulating his request and in identifying the information it held in order to facilitate the complainant making his requests.

⁴ <https://ico.org.uk/media/action-weve-taken/decision-notice/2017/2014602/fs50662278.pdf>

57. The complaint in that case followed a First-tier Tribunal decision relating to an even earlier request from the complainant and the request was for information about the evidence provided to the Tribunal by the council during the hearing for that case.
58. After the current request was received by the council, further correspondence and requests were made by the complainant. The Commissioner notes that a further 3 requests were received dated 15, 17 and 18 December 2017 requesting information on the accounts and council minutes, and asking the council to explain its actions in respect of these issues. Although these cannot be taken into account as part of her determination as regards the requests in question in this particular case, they nevertheless show a determination to continue questioning the council and its actions into the future.
59. The Commissioner recognises that this is a continuation of the complainant's pattern of behaviour in respect of the council. The Commissioner considers that if the council responded to the above requests this would not curtail further questioning and further requests being received by the council from this complainant.
60. It appears that the complainant has continued a pattern of behaviour since at least 2015. He persistently requests information, points out errors in the council's procedures and questions the council's practices and decisions. This has placed significant pressure on the council and in particular the council's clerk and former clerks. Given the limited number of hours which the clerk works, this takes time away from her carrying out her other duties in other areas of the council's administration and creates a significant burden which would build up over a period of time.
61. Although the Commissioner recognises that the complainant's requests do have a value and purpose, the manner and tone with which the complainant has approached this with the council, together with his actions outside of making requests, has had a significant impact on the council's ability to carry out its functions as a public authority.
62. The correspondence appears to be designed to create pressure and burden on the council through a number of channels. The Commissioner considers that it cannot be right for one member of the public to dictate the agenda of a public authority to such an extent that it has a much reduced capacity to carry out its primary functions. In this respect she recognises that the complainant is using his rights under the FOI Act as a tool to obtain information with which he is able to raise further issues with the council, thereby placing further pressure upon it.

63. It is also clear that the complainant's emails can be read in a passive aggressive manner. This would harass and annoy those receiving his correspondence, when bearing in mind the nature and level of correspondence which he has had over an extended period of time. Where this has been pointed out to the complainant previously by the council he has paid no attention to this or sought to argue the point further. The Commissioner also notes that although it has been made clear to the complainant that the council considers his continued correspondence and questioning vexatious, and that it therefore sought to restrict his use of private personal email addresses, he has sought to undermine this by placing additional pressure on the clerk.
64. The Commissioner has considered the long history of issues which have arisen between the parties, the evidence of past requests received by the council from the complainant and borne in mind the limited resources available to the council.
65. She has also considered the manner in which the complainant has approached the council when making his requests, and the other actions he has taken which have inevitably led to an increase to the burden on the council and the levels of harassment, distress and annoyance this is likely to have created. She considers that the current requests form part of a concerted pattern of behaviour which appears to be motivated by a desire to place pressure and increase the burden upon the council.
66. Although the Commissioner acknowledges that these requests are not in themselves particularly burdensome, and she would generally expect that information of this sort would be disclosed as a norm, viewing this request in the context of the history of correspondence and antagonism between the parties, the Commissioner's decision is that the requests were vexatious in this instance. The council was therefore correct to apply section 14.

Section 10

67. The Commissioner notes that the council's action in refusing to respond to requests it received by email does not accord with the requirements of the Act. The requests were received by the authority but no further action was taken in respect of these initially.
68. Where FOI or EIR requests are received by an authority they are under a duty to respond to the requests within the time period of 20 working days, as stipulated in section 10(1) of the Act. Once the requests were received by the council in this case it was placed under a duty to respond to these requests within that time period, regardless of whether the means of contact stipulated to the complainant was followed or not.

69. The council did not, however, respond to the requests by applying section 14(1) until 25 October 2017, outside of this period.
70. The Commissioner has therefore decided that the council did not comply with the requirements of section 10(1) in its response to the requests in this case.

Right of appeal

71. 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

72. 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.

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

Signed

Andrew White
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