

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 28 June 2018

Public Authority: HM Land Registry
Address: Trafalgar House
1 Bedford Park
Croydon
CR0 2AQ

Decision (including any steps ordered)

1. The complainant has requested information about the pattern and value of land ownership for individuals in England and Wales. Her Majesty's Land Registry (HMLR) has refused to comply with the request relying on section 14(1) FOIA.
2. The Commissioner's decision is that HMLR is entitled to rely on section 14(1). She does not require the public authority to take any steps.

Request and response

3. On 29 November 2016, the complainant wrote to HMLR and requested information in the following terms:

"Can you please disclose the same information disclosed to me on 16 April 2015 (see attached) including the information in respect of all private individuals?"

If and to the extent to which you deem the information in respect of private individuals personal information, it is not sensitive personal information and there exists a legitimate public interest in disclosure, i.e. knowing the approx area of land owned by private individual landowners. The public interest in disclosure outweighs any arguments in favour of withholding the requested information."

4. HMRC responded on 21 December 2016 and stated that the requested information was not held.

5. Following an internal review where HMLR maintained its position, the complainant complained to the Commissioner who issued a decision notice under reference FS50672636¹
6. The Commissioner's decision found that HMLR had misinterpreted the request and that on the balance of probabilities, it held information falling within the scope of the request.
7. The Commissioner ordered HMLR to issue a fresh response to the request by either disclosing information of the description specified or by refusing the request in accordance with section 17 FOIA.
8. On 8 March 2018 HMLR issued its fresh response to the complainant. It relied on section 14(1) – vexatious request, to refuse to comply with the request.
9. Although the complainant did not seek an internal review, in the circumstances, the Commissioner accepted the complaint for consideration.

Scope of the case

10. The complainant contacted the Commissioner on 9 March 2018 to complain about the way his request for information had been handled. Specifically he set out that he had filed very few requests in the past two years and that HMLR was talking about a period going back several years at a time when he was grappling with the '*Byzantine manner*' in which they hold information. He asserted that correspondence from unrelated cases was immaterial to the request under consideration.
11. The Commissioner considers the scope of her investigation is to determine whether or not HMLR was entitled to rely on section 14(1) to refuse to comply with the request.

Reasons for decision

12. Section 14(1) FOIA allows a public authority to refuse a request if it is vexatious.
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¹ <https://ico.org.uk/media/action-weve-taken/decision-notice/2018/2173178/fs50672636.pdf>

13. In the Commissioner's view, section 14(1) FOIA is designed to protect public authorities from requests which have the potential to cause a disproportionate or unjustified level of disruption, irritation or distress. This will usually involve weighing the evidence about the impact on the authority and balancing this against the purpose and value of the request. This should be judged 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 public authority.
14. In the Commissioner's view, although FOIA is generally purpose and applicant blind, for the purposes of applying section 14(1), a public authority may take into account the motive of the requester as well as their identity. The request under consideration in this notice is a request that has been made for journalistic purposes and HMLR has also taken this into account when reaching its final decision.
15. It is HMLR's position that the number, frequency, nature and scope of requests made to HMLR by the complainant represent a disproportionate and unjustified burden on the public authority. Despite an apparent awareness of this burden, the complainant continued to make complex and frequent requests.
16. Although the complainant's requests cover a range of topics, their main focus has been:
 - property ownership as it relates, for example, to overseas companies, private individuals, local authorities and Church Commissioners, and
 - mapping extent information, such as INSPIRE about area owned or leased.
17. In respect of 'area owned' (INSPIRE) information, HMLR has received 13 separate requests for information leading to four requests for internal reviews and a referral to the ICO.
18. In respect of requests about land owned by, leased to or connected with overseas companies (IOPN), HMLR has received 20 requests.
19. In relation to all of the complainant's requests, HMLR has stated that since June 2014 he has made in total 82 requests under FOIA, 19 requests for internal reviews and has made 7 referrals to the ICO. A table at annex A sets this information out. The Commissioner notes that in issuing the complaint with a refusal notice relying on section 14(1), HMLR provided the complainant with an 80 page document setting out

the detail of these requests, requests for review and referrals to the ICO.

20. It is HMLR's position that to handle the volume of requests, internal review requests, to provide advice and assistance and to respond to the ICO following any complaints, places a disproportionate burden on its resources.
21. Although the majority of requests are handled by the FOIA team, the FOIA personnel are required to liaise as necessary with colleagues from a variety of departments. HMLR has provided a breakdown of staff involved in handling the complainant's requests and this is attached as an annex B
22. In its submission to the Commissioner, HMLR has set out that in relation to its dealings with the complainant, its FOIA logs have recorded over 1200 emails which have been sent/received and details are recorded of nine telephone conversations.
23. HMLR has explained that there is evidence of unreasonable persistence in continuing to make requests for information despite exemptions having been applied previously and despite detailed guidance having been provided to the complainant as to how he might obtain requested information via other means and particularly via its website. It is also HMLR's position that requests for similar information have been made following ICO confirmation that HMLR had correctly relied on an exemption.
24. With regard to the complainant's request for INSPIRE information, it is HMLR's position that the complainant has demonstrated unreasonable persistence.
25. Having made a request for INSPIRE information and having been told it was reasonably accessible via HMLR's website², the complainant continued to make similar requests for information within the space of 13 months, these requests are included in Annex A. During this time, correspondence had passed between HMLR and the complainant in relation to a request where the cost of supplying this information had been an issue. During the course of his correspondence with HMLR, the complainant had acknowledged that *"my requests have sometimes strained the resources of the department."*
26. During the course of this correspondence regarding costs, which the complainant had offered to pay, he then approached HMLR and

² [INSPIRE Index Polygons spatial data - GOV.UK](#)

attempted to 'make a deal' describing his proposition as an *"alternative arrangement."* He set out that during the past year he had filed somewhere in the region of 30-40 separate FOI requests to HMLR and during that period had occasionally been in contact with HMLR on a daily basis. He set out that if HMLR were to provide him with the information he had requested, free of charge, he would not file any further FOI requests to HMLR for *"one whole year"* from the date of his email. He set out that he would *"uphold this promise as a matter of word and contract"* and further advised HMLR, *"I guarantee that this arrangement represents outstanding value for money for the Land Registry."*

27. The complainant's proposal was made following the rejection of an earlier proposal in relation to the same request. The complainant had offered to come into HMLR and help with the query in order to help reduce the cost burden. His offer included the option of him signing a non-disclosure agreement; he offered to help to clean the data or write the code for his query.
28. Following HMLR's rejection of these 'offers' and its refusal of his request for information, the complainant has lodged 56 further requests for information and made 17 requests for an internal review of HMLR's decision. These are included in Annex A.
29. He continued to make requests relating to INSPIRE information and in May 2016 he referred a complaint to the Commissioner which was subsequently withdrawn without the need for a decision notice.
30. In August 2016 the complainant made a further request to HMLR for INSPIRE information and again this was referred to the Commissioner and withdrawn without the need for a decision notice.
31. HMLR has explained to the Commissioner that it then received a further request for INSPIRE information in March 2017. HMLR refused this request relying on s14(1).
32. Only a few hours after HMLR issued its section 14(1) refusal, the complainant wrote to HMLR asking that he be provided with a date in the future when *"a new request along these lines would not be considered vexatious within the meaning of section 14(1)."*
33. Five days later the complainant again wrote to HMLR and asked *"can you please confirm that if I re-submit a substantially similar request within 60 working days time – i.e. on 23 June 2017 – that this request will not be considered vexatious?"*
34. It is HMLR's position that the complainant has demonstrated continued persistence by submitting requests for information when he is aware of

HMLR'S position under FOIA. His persistence clearly demonstrating that he has no intention of refraining from making requests despite being fully aware of HMLR's position.

35. It is not only requests for INSPIRE information where the complainant demonstrates such persistence and intransigence, he has demonstrated these behaviours in requesting IOPN (Index of proprietors' names) information also.
36. In its submission to the Commissioner, HMLR has explained that it received a request for IOPN information from the complainant in December 2015 and following refusal, he continued to pursue the matter of IOPN information until October 2016.
37. His request was for a copy of the entire IOPN as a linked and re-useable computer dataset. HMLR refused the request in accordance with the FOIA. HMLR provided a link to its practice guide which explained the circumstances in which an IOPN search may be carried out and how an application could be made³.
38. Notwithstanding this previous refusal, the complainant subsequently requested snapshots of the IOPN. This was again refused on the same basis as the request for the entire IOPN.
39. The complainant then requested information about the database itself which resulted in disclosure of some information about the database (rather than the content). The request also asked for a copy of the 'data dictionary' which was refused in accordance with FOIA.
40. The complainant then made a request for a snapshot of the dataset for a particular date.
41. Irrespective of the nature of the information requested, it is HMLR's position that the complainant's requests and correspondence are frequent and overlapping and that this can be seen from the example set out above and the table at annex A.
42. It is HMLR's position that the complainant does not wait for the response to a request before lodging a further request or corresponding by email. Further correspondence is then submitted as soon as a reply is issued.
43. HMLR has made reference to the fact that during an investigation, the Commissioner had to write to the complainant to ask him to refrain from

³ [Practice guide 74: searches of the index of proprietors' names - GOV.UK](#)

continuing his correspondence with HMLR whilst her investigation was ongoing.

44. In its submission to the Commissioner, HMLR has explained that the nature of the correspondence is such that HMLR is often considering multiple sets of information and that the overlapping nature of the correspondence causes confusion which can result in the need for HMLR to devote additional time and resource to identify precisely the requirements of each item of correspondence. HMLR considers that the requests and further correspondence represent a significant and unjustified burden.
45. HMLR also considers that the complainant's persistence in making requests for the same or similar information requires a disproportionate effort in responding to him. It has explained in relation to requests for information about land ownership that this information is often available by other means. HMLR contends that it has provided the complainant with detailed advice on how to obtain the information but that the complainant continues to make requests in what can only constitute an attempt to circumvent the existing available methods of obtaining the information.
46. The complainant often refers to the public interest in the provision of information he requests but of course where that information is publicly available, it can be accessed in the same way by any individual.
47. With regard to the purpose and value of the request, HMLR acknowledges that information which is requested for journalistic purposes will have some inherent public interest. Information relating to 'land ownership' and 'area owned' is high profile and there is significant public interest in the topic. There is therefore no question that the requests relating to this information have a real purpose and value.
48. The Commissioner must now consider whether this purpose and value is sufficient to justify the impact on the public authority.
49. The Commissioner considers that HMLR has engaged with the complainant over a lengthy period of time and during that time has sought to provide advice and assistance as appropriate.
50. Despite HMLR's engagement with the complainant, he has often resisted the most obvious option of accepting the advice given by HMLR in favour of submitting fresh correspondence and or requests. His focus is often on the next request rather than giving consideration to any exemptions applied under the FOIA in relation to previous requests. This can be seen from the fact that he requests information that is the same or similar to previous requests and with regard to the application of section

14 in March 2017, his main concern was when he could submit a new request for the information. It is apparent that he intends to continue to submit requests to HMLR for information about ownership of land and area owned.

51. The Commissioner considers that in addition to the real purpose and value of the request, there is a significant personal interest on the complainant's part which is demonstrated by his persistence and intransigence on the issues of INSPIRE and IOPN information. It appears to be the case that the complainant has reached a point where he is unable to consider these issues objectively and has continued to bombard HMLR with requests where there can be no realistic prospect of disclosure. Such an approach suggests that the issue has become personal as there can be no realistic prospect of disclosure given the history of his requests.
52. The Commissioner notes however that HMLR has, in the past, erroneously disclosed information to the complainant under FOIA which of course may give a requester some optimism that a similar situation may prevail in the event of further requests.
53. The Commissioner has, as HMLR has pointed out, had dealings with the complainant in relation to his concerns about HMLR. The Commissioner favours informal resolution and will often set out her position to a complainant prior to issuing a decision notice. If it is the case that a complainant does not wish to challenge the Commissioner's position then it is open to them to withdraw the complaint. Therefore, although a complainant may choose to withdraw a complaint, it can often be the case that they do so in the full knowledge of the Commissioner's position.
54. HMLR is correct to note that the Commissioner, in one case referred to her, had to ask the complainant to refrain from continuing his correspondence with HMLR on a particular issue as she progressed her investigation. She had to remind the complainant of her request as he continued to correspond with HMLR despite the initial request that he refrain from doing so.
55. In another case, the Commissioner had to explain to the complainant that she did not act on behalf of either party and would not be acting as an intermediary as he sought to make a fresh request to HMLR during an investigation.
56. Also during the course of her dealings with the complainant in relation to his HMLR cases, the Commissioner had cause to write to him advising that one of his complaints to her office was frivolous within the meaning of section 50(2)(c) FOIA .

57. She explained that the ICO has a duty to consider the effect that dealing with frivolous complaints will have, both in relation to the ICO's duty to make effective use of limited resources, and in ensuring that the ICO and the Act are not brought into disrepute by progressing complaints which do not justify serious consideration. The complainant withdrew his complaint upon the Commissioner's request.
58. Such action is not taken lightly by the Commissioner but in this case it reflected the fact that the complainant was unwilling to accept that HMLR had adequately explained its position which was the same as in its earlier dealings with the complainant on the same issue.
59. The Commissioner considers that the complainant does not seem to either consider or accept that the FOIA must be applied fairly and consistently and that it is not open to requesters to pursue a matter in such a way that causes irritation and distress to a public authority.
60. The Commissioner considers that HMLR has adequately detailed why the complainant's persistence and intransigence in relation to his requests for information relating to INSPIRE data and IOPN data in particular has created a significant burden and that continuing to deal with his requests would not satisfy the complainant and may have the potential to lead to more requests for information.
61. The Commissioner notes that HMLR has relied on section 14(1) at the point at which she has issued a decision notice requiring HMLR to issue a fresh response to a request. It is her position that HMLR would have been justified in relying on section 14(1) in relation to the original request or indeed in relation to any number of previous requests for information.
62. She notes that HMLR relied on section 14(1) to refuse a request for a snapshot of IOPN data in March 2017 and that this appears to have been unchallenged by the complainant.
63. The Commissioner notes the complainant's position that many of his older requests were submitted to HMLR *"at a time when he was grappling with the 'Byzantine manner' in which they hold information."* It is clear from these comments that the complainant considers that his older requests were justified. The Commissioner does not agree that his 'grappling' with how HMLR holds information justifies all of those older requests nor does she consider his continued persistence to be justified. It is possibly the case that the complainant has continued to pursue requests for the same or similar information in the hope that his persistence will somehow ultimately pay off.

64. It is difficult to say with certainty that the requests lodged following the rejection of the complainant's 'alternative arrangement' were made as a result of that rejection or not but the Commissioner considers that it is pertinent to note that the complainant is determined in his attempts to pursue disclosure, irrespective of the impact on the public authority or the potential for undermining the process in place for requesting information under FOIA. It is difficult to see how he could have considered it appropriate to suggest the 'alternative arrangement' let alone to see how he could have considered that a public authority could or would have accepted such a proposition.
65. She notes too that the complainant considers that correspondence from unrelated cases is irrelevant in this case. The Commissioner considers that in applying section 14 to a request, background is entirely relevant and this would of course include previous requests to the public authority. At the time of receiving the complaint, the Commissioner provided the complainant with a copy of her section 14 guidance⁴ as a reference point.
66. The Commissioner accepts that the complainant's requests and correspondence represent a significant burden to HMLR and considers that much of the information requested in relation to INSPIRE and IOPN is publicly available, even where it is available for a fee. She further considers that although there is a real purpose and value to the requests, it is not sufficient to justify the burden, the level of distress and the irritation which those requests have caused. The Commissioner considers that HMLR would have been justified in relying on section 14(1) prior to being asked for a fresh response in this case and considers that its reliance on section 14(1) now is entirely appropriate.
67. In determining that section 14(1) has been correctly applied in this case, the Commissioner was aware that the request was made for journalistic purposes. However, she considers that a request for journalistic purposes does not mean that a requester can adopt whatever approach they consider appropriate in a bid to achieve disclosure. In this case the complainant has continued to demonstrate intransigence and unreasonable persistence which has contributed to the burden on HMLR. As the Commissioner has outlined, the FOIA must be applied fairly and consistently and, irrespective of any journalistic purpose, this request clearly falls to be refused in accordance with section 14(1).

⁴ <https://ico.org.uk/media/for-organisations/documents/1198/dealing-with-vexatious-requests.pdf>

Right of appeal

68. 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 7395836

Email: GRC@hmcts.gsi.gov.uk

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

69. 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.
70. 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

Terna Waya

Senior Case Officer

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Annex A

	<u>Date</u>	<u>Topic</u>	<u>Exemption</u>
1	30/06/2014	Land owned by Oversea companies (titles and names since 2005)	No
2	15/07/2014	Land owned by Oversea and British companies and polygons ID	No
3	08/08/2014	Annual sales of PN1 forms	No

4	08/08/2014	Not satisfied with our response to the FOI request -companies	N/A
5	01/09/2014	Details of all LR Datasets	No
6	18/09/2014	Process of obtaining addresses of properties where title numbers known	N/A
7	13/10/2014	Details of all gifts and hospitality	No
8	28/10/2014	Answers to every single FOI request made since May 2010	S12
9	31/10/2014	Overseas companies (ICO Case Ref: -FS50558762)	N/A
10	05/11/2014	Details of all gifts and hospitality - further details	No
11	28/01/2015	Crown Estate Commissioners as landlords	No
12	29/01/2015	Details of historic ownership GLA	No
13	23/02/2015	The pattern and value of landownership in England and Wales	S12
14	20/03/2015	The pattern and value of landownership in England and Wales	S12
15	26/03/2015	The pattern and value of landownership in England and Wales	No
16	16/04/2015	The pattern and value of landownership in England and Wales	No
17	20/04/2015	Land Charges database	S21
18	29/04/2015	Complete database of INSPIRE ID and Corresponding title numbers	S21
19	05/05/2015	Complete database of INSPIRE ID and Corresponding title numbers	N/A
20	18/05/2015	Overseas companies Top 50 by area	N/A
21	15/06/2015	£5M+ Residential properties in West London	No
22	26/06/2015	INSPIRE ID - OS Companies + RX since 1999	No
23	26/06/2015	INSPIRE ID - OS Companies + tenure/date/area/territory	S21 (Part)
24	08/07/2015	Overseas company data	S12
25	28/07/2015	Area owned by OS companies	No
26	30/07/2015	record & store area-owned data & what computer processes	No
27	03/08/2015	INSPIRE ID - OS Companies + RX since 1999	No
28	04/08/2015	Meetings and correspondence about Land Registry data	S35
29	04/08/2015	Legal advice about Land Registry data	Not held
30	01/09/2015	INSPIRE ID - OS Companies + RX since 1999 (update)	S21 (Part)
31	02/09/2015	Meetings and correspondence about Land Registry data	N/A
32	14/09/2015	internal correspondence my FOI request of 26 June 2015	S36(2) and S40
33	14/09/2015	overseas company registered as an owner of land	S14(2)
34	14/09/2015	Area in square metres for overseas company	S14(2)
35	18/09/2015	Church Commissions as Landlords on Hyde Park estate	S21
36	21/09/2015	Area owned in square metres of each title number registered IFO overseas Co	N/A
37	21/09/2015	Name, add. and territory of each overseas Co registered as owner of land	N/A
38	22/09/2015	Church Commissioners (change of request)	S21 (Part)
39	22/09/2015	Title numbers of o's overseas cos with restrictions IFO named bodies in the list	S21 (Part)
40	23/09/2015	Refusal of information under S21 to request dated 26/6 and refined on 5/8	-
41	29/09/2015	Info on meetings & corres about LR data - withheld under S36	
42	13/10/2015	Provide polygon ID refs for the list of titles (Overseas Companies) for £85	
43	13/10/2015	Redaction of info under S36(2) on copy email 28/9/15 from Data Team	N/A
44	16/10/2015	Area owned, FH/LH title count and PP in respect of all categories of proprietors	No
45	27/10/2015	Titles leased by local authorities to overseas companies, and vice versa	See 05/11

46	29/10/2015	Requesting Lessee Title numbers (follow up to request of 22/9)	S21(Part)
47	30/10/2015	Title numbers which were leased by CH/COM to which overseas cos, date PPI	
48	05/11/2015	Titles leased by local auth to overseas companies, and vice versa	S21(Part)
49	05/11/2015	Refusal of information under S21 to request dated 26/6 and refined on 5/8	N/A
50	16/11/2015	Clarify what you mean by info not recorded -Area in square meters	No
51	16/11/2015	Area owned, FH/LH title count and PP in respect of all categories of proprietors	No
52	24/11/2015	Clarification/info not released in a re-usable machine reader format	N/A
53	24/11/2015	Area owned in square metres split f/h-l/h from 1999	N/A
54	01/12/2015	Press Office - lines to take	No
55	08/12/2015	Back to Back property transactions	S21
56	09/12/2015	Seeking advice under S16 for refusal to provide info to his QS (ii)-(iv)	N/A
57	18/12/2015	Titles leased by local auth to overseas companies, and vice versa	N/A
58	18/12/2015	Complete IOPN dataset under RSPI	S21/S40
59	08/01/2016	S16 advice required	N/A
60	12/01/2016	Complete IOPN dataset under RSPI	N/A
61	01/02/2016	INSPIRE IDs and Title numbers	N/A
62	03/02/2016	HM Treasury RXs - title numbers	No
63	03/02/2016	Back to back transactions	N/A
64	08/02/2016	Overseas companies with care of address - 2 firms	S21
65	10/02/2016	Overseas companies - snapshot on 2 dates	S21
66	12/02/2016	Titles leased by LAs to OS companies	S21
67	12/02/2016	Titles leased Church Commissioners to OS companies	S21
68	12/02/2016	Titles leased central gov depts to overseas companies	S21
69	12/02/2016	Staff expense claims	S12
70	26/02/2016	INSPIRE IDs and Title numbers	
71	26/02/2016	confirmation on back to back transactions	N/A
72	07/03/2016	Overseas companies with care of address - 1 firm	S21
73	09/03/2016	Complete IOPN dataset under RSPI	N/A
74	09/03/2016	Overseas companies - snapshot on 2 dates	N/A
75	09/03/2016	IOPN and INSPIRE snapshots on 3 dates	S21
76	01/04/2016	IOPN and INSPIRE snapshots on 3 dates	N/A
77	12/04/2016	INSPIRE IDs in free overseas dataset	S21
78	12/04/2016	Personal Information Charter	
79	19/04/2016	IMC minutes	N/A
80	21/04/2016	Disclosure log - 7 requests	N/A
81	21/04/2016	Details of leaks and disclosures	S43
82	04/05/2016	Copy of the C register audit	Not held
83	10/05/2016	Emails sent/received since 00:01 1 July 2015 about or mentioning [Magazine]	S40
84	10/05/2016	INSPIRE IDs in free overseas dataset	
85	24/05/2016	IOPN and INSPIRE snapshots on 3 dates	N/A
86	27/05/2016	March 2014 LRB minutes and information on use of data leaked to [Newspaper]	S43
87	27/05/2016	Format of the register map and what IT system and coding language it runs on	N/A

88	01/06/2016	C register audit findings and information in P305	S22a & 43
89	01/07/2016	Parameters for email search for [Magazine]	N/A
90	28/07/2016	IOPN database information	S29,31 & 43
91	16/08/2016	IOPN and INSPIRE snapshots on 1 date	S14(2)
92	25/08/2016	Where the rest of the register information is stored	N/A
93	05/09/2016	IOPN and INSPIRE snapshots on 1 date	N/A
94	08/09/2016	Overseas dataset release documents	S35
95	15/09/2016	Overseas dataset as at 31.12.2015	S21
96	15/09/2016	Where the rest of the register information is stored - more detail	N/A
97	03/10/2016	Minutes to all meetings of the LR Rule Committee since 1/1/14	N/A
98	04/10/2016	Refusal to disclose Overseas dataset documents	N/A
99	06/10/2016	Overseas co dataset as at 31/12/2015	N/A
100	26/10/2016	IOPN and INSPIRE snapshots on 1 date	N/A
101	29/11/2016	Freehold area owned as at 31 December 2015	N/A
102	29/11/2016	Freehold land re:individuals	S40
103	21/12/2016	Freehold land re:individuals	N/A
104	14/02/2017	Private individuals who own land and property titles	
105	17/03/2017	IOPN and INSPIRE snapshots on 31.12.2016	S14
106	04/09/2017	Freehold land re:individuals	N/A
107	14/09/2017	Overseas & UK Companies with restrictions - HM Treasury	S31
108	21/11/2017	Code and name of IT programme used to supply data in 2015	S31
109	09/03/2018	Vexatious (As result of decision notice (Request 106))	

Annex B

List of HMLR staff involved in complainant's requests. 2014-2017

FOI Officer or deputy (1 involved) – 98 occasions

FOI Officer or deputy (2 involved) - 14 occasions

IT Officer - 38 occasions

Senior IT Officer - 2 occasions

Corporate Lawyer (1 involved) – 48 occasions

Corporate Lawyer (2 involved) - 7 occasions

Corporate Lawyer (3 involved) - 2 occasions
Corporate Lawyer (4 involved) - 1 occasion
Lawyer (Non-Corporate) - 1 occasion
Board Legal Adviser - 6 occasions
Head of Corporate Legal and Indemnity Services - 11 occasions
Head of Corporate Legal Services (Add Value) -1 occasion
Head of corporate Information Management - 1 occasion
Head of Data Management - 3 occasions
Data Products and Services Manager - 8 occasions
Business Development Fulfilment Team Manager - 2 occasions
Product Manager -1 occasion
Product Manager - 2 occasions
Business Development Executive - 1 occasion
Business Development - 1 occasion
Team Leader Business Development - 1 occasion
Data Capture and Quality Manager - 6 occasion
Data Manager - 1 occasion
Press Manager - 5 occasion
Head of Corporate Communications & Engagement - 2 occasion
Head of Media, Campaigns and Planning - 1 occasion
Deputy Finance Director - 1 occasion
Head of Financial Systems, Finance Group - 1 occasion
Accounts Receivable Officer - 1 occasion
Credit Control - 1 occasion
Finance Officer - 2 occasion
Finance Officer 2
Finance Officer 1
Finance Officer 1
Land Registrar (RFIU) 2
Team Leader (RFIU) 1
Team Leader (RFIU) 1
Counter-Fraud Policy & Strategy Executive 2
Lead Architect (Information Management) 3
Head of Enterprise Architecture, and Technology Group 1
Head of IS Assurance 3
IS Assurance Manager 1
Deputy Director – Technology 2
Senior Software Deployment Engineer 2
It Security Compliance Officer 2
Performance Manager 1
Infrastructure Engineer (Andy) 2
Chief Land Registrar 2
Head of the Chief Land Registrar's Office 4
Executive to the Land Registry Board 1
Executive to the Land Registry Board and Executive Board 4
Private Secretary to Graham Farrant 1
Personal Assistant to the Chief Executive & Chief Land Registrar's Office 2
Head of Facilities Management 1
Central Operations Manager 2
Head of Land Charges 1

Reference: FS50731070

ICO 8
Ordinance Survey 1
BEIS 1