

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 15 August 2019

Public Authority: Arts Council England
Address: The Hive
49 Lever Street
Manchester
M1 1FN

Decision (including any steps ordered)

1. In two separate requests the complainant has requested information from Arts Council England (ACE) about a draft letter and Acceptance in Lieu Panel recommendations and correspondence. With regard to part [1] of request 1, ACE provided relevant information it holds. With regard to part [2] of request 1, ACE provided some relevant information and has refused to fully comply with this part under section 12(1) of the FOIA (cost exceeds appropriate limit). ACE's final position with regard to request 2 is that it is refusing to comply with this request under section 14(1) of the FOIA (vexatious request).
2. The Commissioner's decision is as follows:
 - ACE has complied with section 1(1) with regard to part [1] of request 1.
 - ACE can rely on section 12(1) to refuse to comply with part [2] of request 2. ACE complied with section 16(1) with regard to this part as it offered the complainant adequate advice as to how he might refine his request to bring complying with it under the cost limit.

- ACE can rely on section 14(1) to refuse to comply with request 2.
 - ACE breached section 10(1) of the FOIA with regard to part [1] of request 1 as it did not comply with section 1(1) within 20 working days. ACE breached section 17(5) with regard to part [2] of request 1 and request 2 as it did not issue a refusal notice within the above timeframe.
3. The Commissioner does not require ACE to take any remedial steps.

Request and response

Request 1 – FS50786707

4. Continuing a correspondence with ACE that had begun in February 2017, on 6 May 2018 the complainant wrote to ACE and requested information in the following terms:

[Part 1]. "Could you kindly inform me whether all the Panel members agreed the letter prior to its issue. They are likely to have done so at a minuted meeting or in an email circulated among the Panel. I do not seek the specific details at present, only the information.

[Part 2] May I infer from your answer that the AILP or Arts Council have no knowledge of an AILP recommendation ever having been rejected by the Secretary of State or a minister of the devolved nations? (I did ask whether you were aware of such a recommendation ever having been rejected)."

5. This request relates to an earlier, and similar, request the complainant had submitted to ACE on 23 March 2018. In its response to that request, ACE had released the names of the members of the Acceptance in Lieu Panel (AILP), advised that no AILP recommendations had been rejected in the previous five years and advised when the last AILP rejection had been.
6. In email correspondence to the complainant on 16 May 2018 ACE said it was unable to process the complainant's "messages" of 6 May 2018 under the FOIA or advise any further on the matter.
7. The complainant requested an internal review on 20 May 2018. Correspondence followed on the matter of the internal review and on 24 May 2018 ACE asked the complainant to clarify which requests and responses he wanted to be reviewed.

8. As a result of the Commissioner's investigation, ACE provided a clear response to request 1 on 25 April 2019. It released information it holds that falls within the scope of part [1]. With regard to part [2] ACE confirmed that in 2014 and in 2018 there was a rejection of two AILP recommendations for the acceptance of two cultural gifts; and that in the early 1990s the AILP process was subject to long term delays. ACE confirmed that it holds files going back to January 1993 but that it would take over 18 hours to go through these files to provide an answer to part [2]. ACE suggested how the complainant might refine his request to bring complying with it within the time and cost limit.

Request 2 – FS50816703

9. On 8 June 2018 the complainant made the following request for information under the FOIA.

"...all the information, to which I am entitled, that the AILP has generated as a result of my emails related to the subject of the AILP decision to recommend the acquisition of the oil painting by Allan Ramsay of Bonnie Prince Charlie."

10. ACE provided a response on 14 June 2018. It refused the request. It said it was carrying out a review of the complainant's previous requests on the topic of the AILP decision with regard to the painting and that the current request did not appear to ask for anything that had not been covered previously.
11. The complainant requested an internal review of ACE's response to request 2 on 14 June 2018. On the same day ACE advised the complainant that it would not provide a separate internal review but would address his latest correspondence in the internal review that it was already carrying out.
12. ACE wrote to the complainant on 21 June 2018, describing this correspondence as an internal review of its responses FOI-11718 and FOI-11735. ACE listed the requests for information it had received from the complainant and said that [in response to earlier requests] it had released all the relevant information that is not exempt. ACE confirmed that it is withholding some information under section 41 and 44 of the FOIA.
13. In its response to the complainant of 25 April 2019, ACE provided some information relevant to request 2, withholding some under section 40(2)(third person personal data).
14. However, as a result of the Commissioner's investigation, on 2 May 2019 ACE provided the complainant with a further and final response to

this request. Irrespective of its earlier responses, ACE is now relying on section 14(1) to refuse to comply with request 2.

Scope of the case

15. The complainant first contacted the Commissioner on 18 September 2018 to complain about the way his requests for information had been handled, including its handling of the internal review process.
16. Following ACE's further responses of 25 April 2019 and 2 May 2019, the complainant wrote to the Commissioner on 19 July 2019, outlining the nature of his dissatisfaction with ACE's final response to his requests.
17. In this correspondence the complainant: details his wider correspondence with ACE, discusses what he considers to be ACE's failings in its dealings with him; and argues why ACE should release information he has requested.
18. The Commissioner's investigation has focussed on ACE's final responses of 25 April 2019 and 2 May 2019: whether it has complied with section 1 of the FOIA with regard to part [1] of request 1; whether it can rely on section 12(1) to refuse to fully comply with part [2] of request 1 and whether it can rely on section 14(1) to refuse to comply with request 2.
19. The Commissioner has finally considered whether ACE complied with its duty under section 16(1) with regard to part [2] of request 1 and its duties under section 10(1) and 17(5) with regard to both requests.
20. The Commissioner has discussed the complainant's concerns about ACE's handling of the internal review process under 'Other Matters'. Provision of an internal review is not a requirement of the FOIA and the Commissioner cannot make a formal decision on this aspect of the complaint.

Reasons for decision

Request 1 - FS50786707

Section 1 – general right of access to information held by public authorities

21. Under section 1(1) of the FOIA anyone who requests information from a public authority is entitled under subsection a) to be told if the information is held and under subsection b) to have the information communicated to him or her if it is held and is not exempt information.

22. The Commissioner has considered whether ACE has complied with section 1(1) with regard to part [1] of request 1. This is for confirmation that all AILP members agreed to a particular letter before that letter was issued. In his request, the complainant has said that he is seeking only the information, not the "specific details".
23. By way of background, the Acceptance in Lieu scheme enables taxpayers to transfer important works of art and heritage objects into public ownership while paying Inheritance Tax (or one of its earlier forms). The AILP advises Ministers on all items offered under the scheme and on the allocation of objects. The Commissioner understands that the painting of Charles Edward Stuart ('Bonnie Prince Charlie') in question was acquired by the Scottish National Portrait Gallery through the Acceptance in Lieu scheme. The complainant has concerns about the authorship and valuation of the above painting and a possible associated fraud that he had identified.
24. ACE has explained that on 12 July 2017 the complainant had sent an email to the AILP inbox with a letter addressed to the AILP chairman reporting his latest research into the commissioning letter for the Ramsay Portrait. His letter also requested an "*independent review, commissioned confidentially by the panel*". ACE says a response to this letter was drafted and circulated to the AILP members for its information. The letter (ie the letter to which the complainant refers in his request) was then sent to the complainant by email from the AILP mailbox on 2 August 2017.
25. In an initial submission to the Commissioner on 15 March 2019, ACE referred to an email it had sent to the complainant on 23 April 2018 (ie prior to request 1 being submitted on 6 May 2018). In that email, a copy of which ACE provided to the Commissioner, ACE had released a list of the names of the individual Panel members who saw and agreed the letter in question. ACE told the Commissioner that the list included the names of all of the 2017 AILP members, as shown on ACE's website. In its 23 July 2018 email, ACE had also confirmed that no rejection of an AILP recommendation by the Secretary of State or a Minister in the devolved nations was known in the last eight years.
26. In part [1] of request 1, the complainant asked whether all Panel members agreed a particular letter prior to its issue and suggested they would have been likely to do so at a minuted meeting or through a circulated email. In its final response to the complainant on 25 April 2019, ACE confirmed that all Panel members had agreed the letter in question and it released information that it considered to be relevant.
27. ACE provided this material to the Commissioner. It comprises:

- An extract from the 22 June 2017 meeting minutes in which it is confirmed that the Chairman would draft the letter.
 - A 'Matters arising' item from the 20 July 2017 AILP meeting relating to the AILP meeting of June 2017 which refers to the Chairman's draft response to the complainant's letter being attached (ie circulated).
 - An email from the AILP secretariat to the AILP members dated 26 July 2017 circulating the Chairman's draft letter and asking for comment.
 - Emails from some Panel members commenting on the draft letter.
 - The covering email from the 'AIL Panel' to the complainant, dated 2 August 2017, attaching the final letter.
28. The Commissioner considers that a reasonable interpretation of the recorded information ACE has released is that the content of the AILP Chairman's letter sent to the complainant on 2 August 2017 had been agreed by the whole Panel. She is satisfied that, from the released information and from the confirmation AILP has given, which was derived from the recorded information (ie that all the Panel agreed the letter), ACE has complied with section 1(1) of the FOIA with regard to part [1] of request 1.

Section 12 – cost exceeds the appropriate limit

29. Section 12(1) says that a public authority is not obliged to comply with a request if the authority estimates it would exceed the appropriate cost limit to do so.
30. The estimate must be reasonable in the circumstances of the case. The appropriate limit is currently £600 for central government department and £450 for all other public authorities. Public authorities can charge a maximum of £25 per hour to undertake work to comply with a request; 18 hours work in accordance with the appropriate limit of £450 set out above, which is the limit applicable to ACE. If an authority estimates that complying with a request may cost more than the cost limit, it can consider the time taken to:
- determine whether it holds the information
 - locate the information, or a document which may contain the information
 - retrieve the information, or a document which may contain the information, and
 - extract the information from a document containing it.

31. Where a public authority claims that section 12(1) of the FOIA is engaged it should, where reasonable, provide advice and assistance to help the applicant refine the request so that it can be dealt with under the appropriate limit, in line with section 16(1) of the FOIA.
32. Part [2] of request 1 is for confirmation that neither the AILP nor ACE had any knowledge of an AILP recommendation "ever" having been rejected by the Secretary of State or a Minister of the devolved nations.
33. In its 23 July 2018 email to the complainant, ACE had confirmed that no rejection of an AILP recommendation by the Secretary of State or a Minister in the devolved nations was known in the last eight years.
34. In its final response to the complainant of 25 April 2019, ACE confirmed that in 2014 and in 2018 there was a rejection of two AILP recommendations for the acceptance of two cultural gifts; and that in the early 1990s the AILP process was subject to long term delays. ACE had confirmed that it holds relevant files going back to January 1993 but that it would take over 18 hours to go through these files to provide an answer to part [2].
35. In a submission to the Commissioner on 2 August 2019, ACE advised that it has compiled a list of all relevant 'Acceptance in Lieu' boxes held at its offsite storage facility, and it provided the Commissioner with a copy of this list. The list comprises 192 boxes, which each hold numbers of case files. ACE says it would need to get the AILP papers back from storage as they record all the advice the Panel received and the minutes and matters arising between AILP meetings. ACE says that in order to provide a response to part [2] it would need to review the contents of all the AILP papers.
36. ACE has explained that not all of its records record how many case files there are per box, but that usually there are 5-10 case files per box (so 7 on average). 192 boxes at 7 files per box equates to 1,344 individual case files, which would all need to be reviewed manually. Each file will contain on average about 100 pages including the 'offer' papers. ACE advises that some case files have significantly more pages, especially where the offer relates to a collection or an archive.
37. ACE notes that there are 1,080 minutes in 18 hours. That being the case, ACE says it would mean that it could only spend 1.08 minute on each file, if it is to get through all the case files in 18 hours. This work would include recalling the files and returning them to the storage facility; unpacking them etc. ACE says that the time it would take to recall the files alone is more than 1.08 minute. It would need at least 10 minutes per file ($10 \times 1000 = 10,000$ minutes/166 hours) – by which the Commissioner understands that ACE means 10 minutes to review

each file - and five minutes to recall each box ($192 \times 5 = 960$ minutes/16 hours). ACE has confirmed that the amount of time it would take to comply with part [2] would therefore be in excess of the 18 hours provided under section 12(1). ACE has also noted that there are also costs associated with box retrieval from its storage facility, which would likely be above the cost threshold of the £450 provided under section 12(1).

38. In part [2] of request 1, the complainant has asked if an AILP recommendation has “ever” been rejected. The scope of this part is therefore very wide; ACE holds relevant records that go back 25 years. The Commissioner has considered ACE’s submission and finds its explanation for why it would exceed the time limit to comply with this part to be reasonable and credible. As such, she has decided that ACE can rely on section 12(1) to refuse to comply with it.

Section 16 – advice and assistance

39. Under section 16(1) of the FOIA, a public authority has a duty to provide advice and assistance to an applicant, so far as it would be reasonable to expect the authority to do so.
40. The Commissioner has decided that ACE complied with section 16(1) with regard to part [2] of request 1. In its response to the complainant of 25 April 2019, ACE suggested to the complainant how he might refine part [2] of request 1 to bring complying with it within the cost limit (it suggested he limit his request to a period of 10 years). The complainant chose not to submit a refined request.

Request 2 - FS50816703

Section 14 – vexatious and repeat requests

41. Under section 14(1) of the FOIA a public authority is not obliged to comply with a request if the request is vexatious.
42. The term ‘vexatious’ is not defined in the FOIA but the Commissioner has identified a number of ‘indicators’ which may be useful in identifying vexatious requests. These are set out in her published guidance and, in short, they include:
- Abusive or aggressive language
 - Burden on the authority – the guidance allows for public authorities to claim redaction as part of the burden
 - Personal grudges
 - Unreasonable persistence
 - Unfounded accusations
 - Intransigence

- Frequent or overlapping requests
 - Deliberate intention to cause annoyance
43. 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.
44. The Commissioner's guidance goes on to suggest 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 on it and balance this against the purpose and value of the request.
45. Where relevant, public authorities also need to take into account wider factors such as the background and history of the request.
46. Request 2 is for:
- "...all the information, to which I am entitled, that the AILP has generated as a result of my emails related to the subject of the AILP decision to recommend the acquisition of the oil painting by Allan Ramsay of Bonnie Prince Charlie."*
47. In correspondence to the Commissioner on 29 March 2019, ACE said that, with regard to this request, the complainant had already received all of the information he was entitled to from the AILP Chair and via his other FOI requests. It said that anything that had not been disclosed was subject to exemption, for example information about individuals' tax liability. (The Commissioner also notes that at paragraph 12 ACE had referred to the exemptions under section 41 and 44 of the FOIA.) Information to which the complainant was entitled had, ACE said, already been provided by the Chair and the complainant had also been provided with everything that it had sent to the National Audit Office.
48. The complainant clarified for the Commissioner that in response to this request he was expecting that he would receive copies of emails and/or reports, redacted where appropriate, that had resulted from his correspondence with the AILP and ACE.
49. The complainant says he was particularly keen to receive information relating to the involvement of the Audit Committee and Internal Audit regarding his submissions. He says that the Department for Culture, Media and Sport (DCMS) had also informed him that ACE staff had looked into the possible fraud issues he had raised and the complainant says he was keen to establish who, or which department, examined the

matter; when it was examined and whether a report was produced and, if so, who received it.

50. By way of a final example, the complainant says he also wished to know who received a copy of his 'January 2018 report' as it appeared to him that there was some confusion about whether members of the AILP received the information or whether the Chair, Chief Executive or the Audit Committee did so. The Commissioner passed the complainant's expectations to ACE on 5 April 2019.

51. The Commissioner notes that the complainant has made the point that his 8 June 2018 request to ACE included the following statement:

"In the unlikely event that you consider my request to be burdensome, then I would be grateful if you could provide the information chronologically, from the earliest date onwards until the point you consider the provision of further information would be burdensome."

52. On 2 May 2019 ACE confirmed to the complainant that it is relying on section 14(1) to refuse to comply with this request. With regard to the above statement by the complainant, the Commissioner advises that ACE is entitled to refuse to comply with the request in its entirety under section 14(1); it is not obliged to comply with the request up to the point it becomes vexatious due to having reached the point where a disproportionate burden is involved.

53. In its submission to the Commissioner of 2 August 2019, ACE confirmed that, as it had advised the complainant on 2 May 2019, it does hold a large amount of internal correspondence. It said that this consists of proof reading of draft replies, spell checking and correcting grammar etc. ACE considered that the complainant would have received the final draft copies of all of this correspondence. It considered that the complainant would have also received all the information that he is entitled to that it holds about the AILP decision to recommend the acquisition of the oil painting in question. ACE said it did not think the complainant would benefit from receiving a large amount of correspondence where spelling errors are being corrected and where the personal data of ACE officers has been redacted.

54. ACE said it had identified approximately 600 pages of correspondence that fall within the scope of the request. It described this material as internal information generated as a result of processing and responding to the complainant's information requests. ACE explained that it would take time to prepare this information before it could be released, as it would need to review each page and consider whether information should be redacted. ACE said the email chains in question also contain other information out of scope of the complainant's requests, and

personal data relating to Arts Council colleagues, for example, references to annual leave and their other workloads.

55. ACE said it was relying on section 14(1) with regard to request 2 as the burden associated with redacting information from the 600 pages of material that it holds is disproportionate to the request's value.
56. It seemed to the Commissioner that ACE's submission was focussed on its internal correspondence regarding its replies to the complainant about his FOI requests. Some of this particular material at least may, in any case, be exempt from disclosure under section 40(1) of the FOIA as it would be the complainant's own personal data. The Commissioner asked ACE to confirm that it had considered the wider interpretation of the request that she had passed to it on 5 April 2019.
57. On 6 August 2019, ACE confirmed to the Commissioner that the correspondence it was referring to includes external correspondence, for example with DCMS, and that it remained satisfied that section 14(1) applies. This is because it considered it would take up too much time and resources to prepare the information for the complainant as it would need to go through it all and check for any information that is exempt under the FOIA.
58. In its 2 August 2019 submission ACE had noted that the work required to review each individual page (of 600 pages), consider any applicable exemptions and produce these in a format for release averages around three minutes per page. The total work required by one member of staff to carry this work out would therefore likely to be in excess of 30 hours. With regard to section 12(1), the Information Commissioner suggests that a cost of £25 per hour should also be taken in to account. Applying that figure to this case would therefore amount to a cost of over £750 to comply with this request.
59. ACE argued that the costs associated with complying with the request have to be taken from public funds and resources, which would therefore impact on other areas of its business. It says that focussing its resources on a large single request would therefore affect its ability to comply with requests that it receives from other members of the public within the requirements of appropriate legislation.
60. The Commissioner has considered the complainant's and ACE's submissions. In her view request 2 is not a request that is patently vexatious. As such, the Commissioner has considered the weight of the impact of the request on ACE and balanced this against the purpose and value of the request.

61. The Commissioner notes that at the point of the request, the complainant had been corresponding with ACE about a particular AILP decision for approximately 15 months. ACE had therefore already devoted significant time and resources to addressing the complainant's queries and requests but it had borne that burden. As a result, the complainant has been provided with a considerable amount of information concerning the subject that is of interest to him – an AILP decision about a particular painting. The complainant has told the Commissioner that he also received "a considerable volume" of associated information from the National Audit Office and DCMS to whom he had also submitted FOI requests.
62. The Commissioner considers that the 30 hours plus that ACE has estimated it would take to comply with the request is a reasonable estimate given the number of pages involved and because any potentially exempt information would be spread throughout this material and would not be straightforward to locate. The complainant's submissions to the Commissioner explain, to a degree, why he is seeking the particular information requested in request 2 ie why it is of interest to him. He has not, however, made a case for the information being of any wider public interest. If the requested information had a wider public interest, this might justify the impact on ACE that complying with the request would cause.
63. The complainant says he is seeking information on the involvement of ACE's audit committee, internal audit and DCMS – with regard to the latter who, or which, department examined concerns about the fraud the complainant says he identified; when these concerns were examined, whether a report was produced and, if so, who received it.
64. In the Commissioner's view, these questions are incidental to the central issue, which was whether a fraud had been committed. ACE has confirmed to the Commissioner that it understands that the complainant does not believe that the painting in question is of Bonnie Prince Charlie, nor that it was painted by Allan Ramsay; by implication he considers that the painting was not worth the amount that was paid for it. However ACE says that its audit team, DCMS and the National Audit Office have all considered the complainant's concerns and have advised the complainant that they were satisfied with the way the offer for the painting had been assessed, and that the complainant's concerns regarding fraud were unfounded.
65. From the information provided to the Commissioner it appears that the complainant's concerns have been independently considered by three bodies and that that particular matter is concluded, albeit not to the complainant's satisfaction. ACE's audit team and DCMS have advised the complainant that they do not consider a fraud to have taken place.

66. The Commissioner considers that spending 30 plus hours reviewing 600 pages of material with a view to releasing information that may indicate to the complainant which teams were involved in the decision that no fraud had occurred, when the decision was made and who received any report that may have been produced would be a disproportionate burden to ACE. The matter of any fraud has been addressed and has little wider public interest; at the point of the complainant's request the complainant has been communicating with ACE about this matter for 15 months and the complainant has received a large amount of relevant information from ACE (and from DCMS and the National Audit Office). For these reasons the Commissioner is satisfied that ACE can categorise request 2 as vexatious under section 14(1) as complying with it would cause a burden to ACE that is disproportionate to the request's value.

Section 10 and section 17 – time for compliance

67. As explained above, section 1(1) of the FOI says that anyone who requests information from a public authority is entitled under subsection (a) to be told if the authority holds the information and under subsection (b) to have the information communicated to him or her if it is held and is not exempt information.
68. Section 10(1) of the FOIA says that an authority must comply with section 1(1) promptly and within 20 working days following the date of receipt of a request.
69. The complainant submitted his first request on 6 May 2018. In its first submission to the Commissioner ACE explained that the complainant had written to ACE twice on 6 May 2018. The response it provided on 16 May 2018 (paragraph 6) was to the first of these emails but it was the second of the complainant's emails that is request 1 of this complaint. ACE acknowledged that it had not, in fact, provided a response to this request. ACE complied with section 1(1) with regard to part [1] of request 1 on 25 April 2019. As such it breached section 10(1) with regard to that part.
70. Section 17(5) of the FOIA says that where an authority is relying on section 12 or section 14 it should provide the applicant with a refusal notice within the time for complying with section 1(1).
71. The complainant submitted his two requests on 6 May 2018 and 8 June 2018. ACE did not issue a refusal notice with regard to part [2] of request 1 until 25 April 2019, and did not issue a refusal notice with regard to request 2 until 2 May 2019. ACE therefore breached section 17(5) in this regard.

Other Matters

72. The Commissioner and the FOI Code of Practice consider it is good practice to provide a review within 20 working days of a request for one and the Commissioner considers that in no case should it take longer than 40 working days. Ideally the review should be carried out by a senior member of staff and not the person who handled the authority's original response.
73. The Commissioner appreciates that at the time of the current requests ACE had been corresponding with the complainant for some time; fielding requests and queries directed both to it and the AILP, for which ACE provides the secretariat function. ACE appears to have got itself in muddle with regards to request 1. This request was submitted on 6 May 2018, one of two queries submitted on the same day. ACE finally provided a clear response to this request on 25 April 2019 and this has been considered under the Section 10 analysis. ACE's correspondence to the complainant of 21 June 2018 does not clearly address request 1 – so cannot be considered to be a response or internal review response. On balance therefore, the Commissioner finds that ACE mishandled the internal review process with regard to request 1.
74. Request 2 was submitted on 8 June 2018. ACE provided a response to this on 14 June 2018 and an internal review on 21 June 2018. Although ACE went on to reconsider its position as a result of the Commissioner's investigation, on balance she considers that ACE's handling of the internal review process with regard to request 2 was adequate.

Right of appeal

75. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)
GRC & GRP Tribunals
PO Box 9300
LEICESTER
LE1 8DJ

Tel: 0300 1234504
Fax: 0870 739 5836
Email: grc@justice.gov.uk
Website: www.justice.gov.uk/tribunals/general-regulatory-chamber

76. 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.
77. 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

Pamela Clements
Group Manager
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF