Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 9 January 2020

Public Authority: St Helens Council
Address: Town Hall
Victoria Square
St Helens
Merseyside
WA10 1HP

Decision (including any steps ordered)

1. The complainant requested information about looked-after children. Specifically, she asked to know about the number of instances where other local authorities had placed children in care in St Helens Council's (SHC) area, and the number of instances where SHC had placed children in care in other local authority areas.

2. SHC disclosed much of the information falling within scope of the request. However, it refused to disclose the number of placements made by, or with, individual councils, where this was five or less, citing section 40(2) (personal information) of the FOIA.

3. The Commissioner's decision is that SHC was entitled to rely on section 40(2) of the FOIA to withhold this information.

4. The Commissioner requires no steps to be taken as a result of this decision.

Background

5. The complainant submitted the same request to multiple local authorities. The Commissioner has initially considered how three local authorities handled the request and is issuing decision notices in respect

of these three lead cases[1]. The remaining cases will be dealt with separately.

6. The request relates to the care placements of looked-after children. A child who has been in the care of their local authority for more than 24 hours is known as a "looked-after" child. Looked-after children are also often referred to as children "in care".

Request and response

7. On 3 December 2018, the complainant wrote to SHC and requested information in the following terms:

> *"Under the Freedom of Information Act, please can you provide me with information about looked-after children placed in care in the local authority area by other councils during the past five financial years (2013/14, 2014/15, 2015/16, 2016/17, and 2017/18). For each year, please can you provide a list of councils that have placed children in care in the area and the number of children.*
>
> *Please can you also provide me with information about looked-after children from the local authority area who have been placed in care in other local authority areas during the past five financial years (2013/14, 2014/15, 2015/16, 2016/17, and 2017/18). For each year, please can you provide a list of councils where the children have been placed and the number of children."*

8. SHC responded on 4 January 2019. For the first part of the request, it disclosed the names of the local authorities that had placed children within its area and the number of placements by each, except whether that number was five or fewer, in which case it redacted the number. It explained that in some cases there was a risk that individual children could be identified from these low figures, and therefore that section 40(2) of the FOIA applied.

9. It gave a similar response for the second part of the request, disclosing the names of the local authorities in which areas SHC had itself placed children and the number of placements it made, except where that number was five or fewer, in which case it redacted the number, citing section 40(2). It said that this approach was in keeping with the Department for Education's policy on publishing statistics about very small numbers of children, which recognised that the risk of individual

[1] The other two are dealt with under the following references: FS50825882 and FS50841896

children becoming identifiable increases when the figures in question are low.

10. Following an internal review, SHC wrote to the complainant on 1 April 2019, amending its position. Referring to there being a *"…plausible and reasonable basis for non-recorded personal knowledge to be considered to present a significant re-identification risk"*, it said that in order to assess whether any such risks applied in respect of the withheld information, it would be necessary to consult with social workers on a case by case basis. It said that the work involved would exceed the appropriate limit of £450, established under section 12 (cost of compliance exceeds appropriate limit) of the FOIA.

Scope of the case

11. The complainant contacted the Commissioner on 26 April 2019 to complain about the way her request for information had been handled.

12. During the Commissioner's investigation, SHC withdrew its reliance on section 12 of the FOIA and reverted to its original position, that the withheld information was exempt from disclosure under section 40(2) of the FOIA.

13. The complainant addressed SHC's application of section 40(2) as follows:

> *"The council hasn't clearly explained why the small numbers are personal data, nor have they made it clear what the route to identification is. There is no evidence that the council has identified the steps that a motivated intruder could take to identify individuals from the suppressed numbers if disclosed. I would argue this is because such a route does not exist and the information is non-identifiable and therefore not personal data.*
>
> *Firstly, this is summarised data that does not include any personal identifiers and relates to large enough population sizes that it would not be possible to identify anyone directly from the published data, and as such the information would not be personalised data, and would not be exempt."*

14. She continued:

> *"…the data requested in and of itself does not contain enough information to identify individuals, so the potential risk comes from third parties being able to deduce the individual's identity using other information they have access to. The only way a third party could deduce the identity of an individual from the data was if they already*

had the specific information about where children in care have been place [sic]*. The information in and of itself is not identifying and cannot be combined with other publicly available data to identify anyone, unless the individuals have already publicly identified them self* [sic]. *Those involved in care cases may feel they are able to guess which children are included in the data, but as the information is not sufficient to confirm this, it can not* [sic] *be regarded as identifying*".

15. The complainant referred the Commissioner to four local authorities that had disclosed the requested information in full, and which had commented to the effect that they did not believe that the requested information was capable of identifying individual children.

16. She also referred the Commissioner to the Upper Tribunal's comments in *The Information Commissioner v Miller [2018] UKUT 229 (AAC)*[2]*,* which found in that case that statistics involving low numbers were not personal data. The complainant believed that similar considerations applied in this case

17. The analysis below considers SHC's application of section 40(2) of the FOIA to withhold:

    - a council-by-council breakdown of the number of placements made by each local authority, within SHC's area, where this number was five or less; and

    - a council-by-council breakdown of the number of placements SHC made in other local authority areas, where this number was five or less.

18. In reaching her decision, the Commissioner has viewed the withheld information.

Reasons for decision

Section 40(2) - personal information

19. It was SHC's position that the withheld information was the personal data of the children who were the subject of the care placements. It

[2] https://assets.publishing.service.gov.uk/media/5b59ab68e5274a3ff594d141/GIA_2444_2017-00.pdf

said that there was a significant risk that individual children could be identified from the withheld information, when this information was combined with other information likely to be known by family members and other individuals involved with the children.

20. Section 40(2) of the FOIA provides that information is exempt from disclosure if it is the personal data of an individual other than the requester and where one of the conditions listed in section 40(3A)(3B) or 40(4A) is satisfied.

21. In this case, the relevant condition is contained in section 40(3A)(a)[3]. This applies where the disclosure of the information to any member of the public would contravene any of the principles relating to the processing of personal data ('the DP principles'), as set out in Article 5 of the General Data Protection Regulation ('GDPR').

22. The first step for the Commissioner is to determine whether the withheld information constitutes personal data as defined by the Data Protection Act 2018 ('DPA'). If it is not personal data then section 40 of the FOIA cannot apply.

23. Secondly, and only if the Commissioner is satisfied that the requested information is personal data, she must establish whether disclosure of that data would breach any of the DP principles.

Is the information personal data?

24. Section 3(2) of the DPA defines personal data as:

> *"any information relating to an identified or identifiable living individual".*

25. The two main elements of personal data are that the information must relate to a living person and that the person must be identifiable.

26. Information will relate to a person if it is about them, linked to them, has biographical significance for them, is used to inform decisions affecting them or has them as its main focus.

27. Having particular regard to the definition above, the Commissioner is satisfied that information about a child's placement in the care system is undoubtedly information which relates to them.

[3] As amended by Schedule 19 Paragraph 58(3) of the Data Protection Act 2018

28. An identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

29. The complainant has disputed that the withheld information is capable of identifying anyone, arguing that the Upper Tribunal decision in *The Information Commissioner v Miller [2018] UKUT 229 (AAC)* supports this position.

30. In that case, the Upper Tribunal found the likelihood of individuals being identified from a particular set of statistics involving low numbers to be "*so remote as to be negligible*", and the complainant believes that similar considerations apply in this case.

31. The Commissioner notes that the request in that case was for UK-wide statistics on homeless households and that the Upper Tribunal commented that the absence of anyone with an identifiable motive for attempting re-identification was relevant to determining whether the withheld information was personal data.

32. Referring to previous Upper Tribunal decisions, the Upper Tribunal said that, when considering disclosure under the FOIA, the proper approach to determining whether anonymised information is personal data is to consider whether an individual or individuals could be identified from it and other information which is in the possession of, or likely to come into the possession of, a person other than the data controller after disclosure. The assessment of the likelihood of identification included:

> *"…assessing a range of every day factors, such as the likelihood that particular groups, such as campaigners, and the press, will seek out information of identity and the types of other information, already in the public domain, which could inform the search."*

33. The Upper Tribunal also quoted the Court of Session (Inner House) in *Craigdale Housing Association v The Scottish Information Commissioner* [2010] CSIH 43 at paragraph 24:

> "*…it is not just the means reasonably likely to be used by the ordinary man on the street to identify a person, but also the means which are likely to be used by a determined person with a particular reason to want to identify the individual…"*

34. The Commissioner's guidance on access to personal information[4] states:

> *"The DPA defines personal data as any information relating to an identified or identifiable living individual. If an individual cannot be directly identified from the information, it may still be possible to identify them".*

35. On the face of it, the withheld information does not *directly* identify any individual. However, because the withheld placement numbers are low (five or less) the Commissioner has considered whether this information, when combined with the local authority names that have already been disclosed and other information, either already in the public domain, or known to particular individuals, may nevertheless make identification possible. The Commissioner is mindful that disclosure under the FOIA is considered as being made to the world at large, rather than to the requester only, and this includes to those individuals who may have a particular interest in the information (and additional knowledge of the specific circumstances of the child) which is not shared by the wider public.

36. In considering this point, the Commissioner recognises that different members of the public will have different degrees of access to the 'other information' which would be needed for re-identification of apparently anonymous information to take place. In her Code of Practice on Anonymisation[5], she acknowledges that "…*there is no doubt that non-recorded personal knowledge, in combination with anonymised data, can lead to identification*".

37. The Code of Practice goes on to state:

> *"Re-identification problems can arise where one individual or group of individuals already knows a great deal about another individual, for example a family member… These individuals may be able to determine that anonymised data relates to a particular individual, even though an 'ordinary' member of the public or an organisation would not be able to do this.*
>
> *…*
>
> *The risk of re-identification posed by making anonymised data available to those with particular personal knowledge cannot be ruled*

[4] https://ico.org.uk/media/for-organisations/documents/2614720/personal-information-section-40-and-regulation-13-version-21.pdf

[5] https://ico.org.uk/media/1061/anonymisation-code.pdf

out, particularly where someone might learn something 'sensitive' about another individual – if only by having an existing suspicion confirmed. However, the privacy risk posed could, in reality, be low where one individual would already require access to so much information about the other individual for re-identification to take place. Therefore a relevant factor is whether the other individual will learn anything new".

38. The Code states that it is also necessary to consider the likelihood of individuals having and using the prior knowledge necessary to facilitate re-identification and whether any new information would be learned from re-identification. The Code notes that:

"The High Court in [R (on the application of the Department of Health) v Information Commissioner [201] EWHC 1430 (Admin)] stated that the risk of identification must be greater than remote and reasonably likely for information to be classed as personal data under the DPA".

39. In the particular decision cited by the complainant, the Upper Tribunal concluded that there was no evidence that anyone would be sufficiently motivated to attempt re-identification, and that this rendered the risk of re-identification taking place "*negligible*". The Commissioner has considered whether the same can be said in this case.

40. In reaching a view on this point, the Commissioner has also consulted guidance on the risks of re-identification arising from child-related statistics, published by the Department for Education (which classifies statistical information about looked-after children as "highly sensitive"). It says:

"*Where there are small numbers of individuals within the aggregated data, the appropriate levels of suppression are applied to make sure there is only an extremely remote risk of identification.*

Example *If a data cell only has 5 children in it, you may be able to infer things from what we have published if you had prior information about that group. For example if you knew 4 of them personally.*

If someone is wilfully or making a conscious effort to identify an individual, they may be able to do so by combining NPD [National Pupil Database] *and multiple other data sources*."[6]

[6] https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data#riskofidentification

41. SHC contends that in the hands of someone with knowledge of a child's wider circumstances, such as a family member, the withheld information is capable of identifying the child. This is because the number of placements in question was extremely low. When viewed in conjunction with the names of the local authorities that have already been disclosed, family members, or others with a similarly close connection with the child, aware of pre-existing links the child may have to particular geographical location, and of key dates relating to their care placements, would be able to deduce from the withheld information that a placement related to a particular child or children. The subject matter of the information is therefore likely to be of considerable interest and value to an individual looking to try to identify where in the care system a particular child might have been placed.

42. SHC added:

> *"The Code of Practice for Statistics issued by the UK Statistics Authority (established under the Statistics and Registration Service Act 2007), which was last reviewed in February 2018, states that when publishing statistics all data protection obligations should be followed and that the rights of data subjects must be considered and managed at all times. We maintain that the suppression of small numbers between 1 and 5 is in line with the Department for Education practices in relation to the data of children."*

43. Drawing on its experience of working with looked-after children and their families, SHC provided a hypothetical scenario to the complainant, demonstrating how the disclosure of the withheld information in this case could be used by individuals, in conjunction with individualised knowledge, to locate children known to them, who had been taken into care.

> *"… an estranged parent of three siblings is motivated to find their children and reviews published statistics, they will already have a rough idea of what year their children were relocated and will be aware of family connections in certain areas. In this instance if we disclose that three children have been placed in one of these areas of known connections, then the children become identifiable to the parent. This is just one example of the risk in releasing these statistics when dealing with small numbers".*

44. In considering the risk of re-identification, the Commissioner agrees with SHC's assessment that information about placements will be of particular interest to family members and other individuals who have close connections with children who have been placed in care. In some cases, this interest will lead to attempts to locate the child. The Commissioner considers that, in those cases, the individual who is intent on locating a specific child in the care system would be likely to be in

possession of specific, personalised knowledge about their wider circumstances, which could be combined with the withheld information to identify an individual child or children. The Commissioner considers that although the number of such individuals is likely to be fairly low, they are likely to be highly motivated to try to identify and locate a particular child or children, and that there is therefore a reasonable likelihood of the withheld information being used for this purpose.

45. The withheld numbers cover placements of between one and five. The likelihood of a child being identifiable where it is revealed that just one or two placements were made within, or by, a local authority will generally be significantly higher than in locations where four or five placements were made. Nevertheless, the Commissioner recognises that it is necessary to conceal the full range of figures, from one to five, to ensure that no inferences can be drawn as to the figure that has been redacted.

46. Following on from this, the Commissioner has considered the consequences for the data subject(s) if re-identification is achieved. The Commissioner considers that the new information which would be learned as a result of re-identification in this case, is that the local authority area in which the child in question had been placed, would be confirmed. This is information which hitherto might merely have been a point of speculation amongst family members, and it would facilitate the type of action SHC described in the hypothetical scenario, above. Quite aside from questions of intrusion and privacy, in a child protection context this is sensitive information and it may, in combination with a mosaic of other information, ultimately lead to the child being located (the hypothetical example provided by SHC describes how this might be achieved). This, clearly, could have very serious consequences for the child, ranging from distress to physical harm.

47. The Commissioner recognises that the information relates to placements made over several years. While the children might no longer be at those placements, the Commissioner considers that someone with knowledge of the connection that a child had to a particular geographical area could use that information to make further enquiries of relevant parties in those areas, and potentially discover information about their subsequent whereabouts.

48. The Commissioner has consulted the Upper Tribunal's decision in *The Information Commissioner v Miller [2018] UKUT 229 (AAC)* and has considered whether a similar approach would be appropriate in this case. She is of the view that, because of the emotive nature of the subject matter to which the withheld information relates, there will be individuals with a vested interest in locating children who have been taken into care and who would be sufficiently motivated to use the withheld information to attempt re-identification. Taking all the above

into account, and having considered the withheld information, the Commissioner is satisfied that, unlike the Tribunal case referred to by the complainant, in this case there is a reasonable risk that the withheld information would be used to attempt re-identification, and that it is therefore a risk which cannot be described as "*negligible*".

49. The Commissioner has then considered the extent to which the withheld information could be capable of identifying individual children.

50. The Commissioner considers that SHC's submissions to her and to the complainant have demonstrated that the withheld information is capable of identifying an individual child or children. She considers that if the local authority information which has already been disclosed is augmented with the number of placements made, and the figures are very low (five or less), when combined with the sort of personal knowledge likely to be held by a family member about a child's particular circumstances, this could, realistically, lead to the child being identified as being the subject of a particular placement.

51. Having reached this conclusion, and because she has determined that the information relates to the individuals in question, it follows that the Commissioner is satisfied that the withheld information falls within the definition of 'personal data' in section 3(2) of the DPA.

52. The fact that information constitutes the personal data of an identifiable living individual does not automatically exclude it from disclosure under the FOIA. The second element of the test is to determine whether disclosure would contravene any of the DP principles.

53. The most relevant DP principle in this case is principle (a).

Would disclosure contravene principle (a)?

54. Article 5(1)(a) of the GDPR states that:

> *"Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject".*

55. In the case of an FOIA request, the personal data is processed when it is disclosed in response to the request. This means that the information can only be disclosed if to do so would be lawful, fair and transparent.

56. In order to be lawful, one of the lawful bases listed in Article 6(1) of the GDPR must apply to the processing. It must also be generally lawful.

Lawful processing: Article 6(1)(f) of the GDPR

57. Article 6(1) of the GDPR specifies the requirements for lawful processing by providing that "*processing shall be lawful only if and to the extent*

that at least one of the" lawful bases for processing listed in the Article applies.

58. The Commissioner considers that the lawful basis most applicable is basis (f) which states:-

> "*processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child*"[7].

59. In considering the application of Article 6(1)(f) of the GDPR in the context of a request for information under FOIA, it is necessary to consider the following three-part test:-

i) **Legitimate interest test**: Whether a legitimate interest is being pursued in the request for information;

ii) **Necessity test**: Whether disclosure of the information is necessary to meet the legitimate interest in question;

iii) **Balancing test**: Whether the above interests override the legitimate interest(s) or fundamental rights and freedoms of the data subject.

60. The Commissioner considers that the test of "necessity" under stage (ii) must be met before the balancing test under stage (iii) is applied.

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[7] Article 6(1) goes on to state:-

> "*Point (f) of the first subparagraph shall not apply to processing carried out by public authorities in the performance of their tasks*".

However, section 40(8) FOIA (as amended by Schedule 19 Paragraph 58(8) DPA) provides that:-

> "*In determining for the purposes of this section whether the lawfulness principle in Article 5(1)(a) of the GDPR would be contravened by the disclosure of information, Article 6(1) of the GDPR (lawfulness) is to be read as if the second sub-paragraph (dis-applying the legitimate interests gateway in relation to public authorities) were omitted*".

Legitimate interests

61. In considering any legitimate interest in the disclosure of the requested information under the FOIA, the Commissioner recognises that such interest can include broad general principles of accountability and transparency for their own sakes, as well as case-specific interests.

62. Further, a wide range of interests may be legitimate interests. They can be the requester's own interests or the interests of third parties, and commercial interests as well as wider societal benefits. They may be compelling or trivial, but trivial interests may be more easily overridden in the balancing test.

63. The complainant has not explained her reasons for requesting the information or the interests that would be served by its disclosure, although the Commissioner understands her to be an investigative journalist.

64. The Commissioner accepts that there is a legitimate public interest in the care system being open and transparent with regard to the general care of looked-after children, and specifically with regard to the arrangements between local authorities for placing children in care out of area.

Is disclosure necessary?

65. 'Necessary' means more than desirable but less than indispensable or absolute necessity. Accordingly, the test is one of reasonable necessity and involves consideration of alternative measures which may make disclosure of the requested information unnecessary. Disclosure under FOIA must therefore be the least intrusive means of achieving the legitimate aim in question.

66. The Commissioner recognises that SHC has disclosed a substantial amount of the requested information and also that, for each year, it has confirmed the total number of child placements made by other local authorities within its area, and the number made by SHC, within other local authority areas. The Commissioner considers that this goes some way towards satisfying the legitimate public interest that has been identified. However, the Commissioner considers that due to the precise nature of the information requested, the disclosure of the remaining withheld information is the only means by which the legitimate interests identified above can be fully met.

Balance between legitimate interests and the data subject's interests or fundamental rights and freedoms

67. It is necessary to balance the legitimate interests in disclosure against the data subject's interests or fundamental rights and freedoms. In

doing so, it is necessary to consider the impact of disclosure. For example, if the data subject would not reasonably expect that the information would be disclosed to the public under FOIA in response to the request, or if such disclosure would cause unjustified harm, their interests or rights are likely to override legitimate interests in disclosure.

68. In considering this balancing test, the Commissioner has taken into account the following factors:

- the potential harm or distress that disclosure may cause;
- whether the information is already in the public domain;
- whether the information is already known to some individuals;
- whether the data subject expressed concern to the disclosure; and
- the reasonable expectations of the data subject.

69. Furthermore, the Commissioner is mindful that Article 6(1)(f) of the GDPR identifies the need to give particular weight to protecting children's data[8].

70. The Commissioner has also borne in mind the best interests of the children in question. The concept of the best interests of the child comes from Article 3 of the United Nations Convention on the Rights of the Child. Although it is not specifically referenced in the GDPR, the Commissioner has stated in her guidance on children and the GDPR[9] that it is something that she will take into account when considering issues to do with the processing of children's personal data. It states that:

> *"In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration."*

71. In the Commissioner's view, a key issue is whether data subjects have a reasonable expectation that their information will not be disclosed. This expectation can be shaped by factors such as a data subject's age, their general expectation of privacy, whether the information relates to them in their professional role or to them as individuals, and the purpose for which they provided their personal data.

[8] https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/?q=child

[9] https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/children-and-the-gdpr/

72. It is also important to consider whether disclosure would be likely to result in unwarranted damage or distress to that data subject.

73. SHC says, and the Commissioner agrees, that the reasonable expectation of looked-after children would be that the location of their placement would be kept confidential by the local authority, for reasons of privacy and safety. The data subjects in this case are not only children, but those children deemed by the Court as being especially vulnerable and at risk of harm. They may have been removed from the care of their parents or guardians and placed under the care of the local authority by order of the Court due to this risk. It is therefore of upmost importance that their rights and freedoms are uppermost in any consideration of whether or not to disclose the requested information.

74. The Commissioner has not seen any information which suggests that the withheld information is already in the public domain and the Commissioner notes that, as the complainant is a journalist, the information, if disclosed, may potentially reach a wide audience.

75. SHC has confirmed that none of the data subjects have been asked whether they are willing to consent to the disclosure of their personal data (depending on the ages and particular circumstances of the children involved, it is by no means clear that meaningful consent could, in any case, be obtained).

76. Based on the above factors, the Commissioner is satisfied that the potential negative consequences for individual data subjects (outlined in paragraph 46, above) outweigh any interests of the public in accessing the information. It follows that she has determined that there is insufficient legitimate interest to outweigh the data subjects' fundamental rights and freedoms, and that the disclosure of the information would not be lawful.

77. Given the above conclusion that disclosure would be unlawful, the Commissioner considers that she does not need to go on to separately consider whether disclosure would be fair or transparent.

78. Her decision is that SHC was entitled to rely on section 40(2) of the FOIA to withhold the information.

Other matters

79. The Commissioner acknowledges that she has upheld SHC's application of section 40(2) to withhold information, when some other councils have disclosed the requested information in full. The Commissioner can only consider the facts of the particular cases presented to her, and will do so on a case-by-case basis. She is aware that the particular circumstances

of each council may vary, according to such factors as the size and population of the local area covered, the profile of the children in its care and the details of their care placements. Any or all of these factors may lead to a different conclusion as to whether or not information may be disclosed without breaching section 40(2).

Right of appeal

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80. 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

81. 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.

82. 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 .....

Samantha Bracegirdle
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