

## **Freedom of Information Act 2000 (FOIA)**

### **Decision notice**

**Date:** 12 August 2021

**Public Authority:** Transport for London  
**Address:** 5 Endeavour Square  
London  
E20 1JN

### **Decision (including any steps ordered)**

---

1. The complainant requested information from Transport for London (TfL) relating to a number of policies/handbooks, the number of employees per area, the number of members with disabilities per area, disability impact assessments per area and various questions in two requests made on the same day. TfL aggregated the requests and refused to provide the requested information citing section 12(1) FOIA – the cost of compliance exceeds the appropriate limit. It did not accept that several parts of the request fell under the FOIA.
2. The Commissioner's decision is that TfL has appropriately cited section 12. She has also concluded that TfL has not breached section 16 FOIA because it provided advice and assistance to the complainant.
3. The Commissioner does not require the public authority to take any further steps.

### **Request and response**

---

4. On 23 May 2019 the complainant made the following request for information under the FOIA for policies and information about

employees involved in the 'Transformation business reorganisation' (request one).

*"1. I have attached the TFL Attendance at Work policy. Can you please confirm why the statutory right pursuant to Health and Safety at work at Section 44 of the Employment Rights Act 1996 is not embedded in this TFL policy? For the avoidance of doubt, the details of this legislation are listed in the link below:*

*<https://www.legislation.gov.uk/ukpga/1996/18/section/44>*

*If you dont [sic] agree, could you direct me to specifically to where in the TFL Attendance at Work policy it is embedded? If you are unable to direct me, are you able to provide me with any TFL policies where the statutory rights pursuant to Health and Safety are embedded?*

*2. I have attached the TFL Equality and Inclusion Policy. Are you able to provide me with the policies pertaining to both Equality Impact Assessments and Disability Impact Assessments and its iterations over the last 10 years?*

*3. Can you provide me with the following information in table format specific to each TFL business area (ie Finance, Human Resources etc) who have been involved in the Transformation business reorginaisation [sic]?*

*Number of employees per area  
Number of employees with disabilities per area  
Number of equality/disability impact assessments conducted per area"*

5. On the same day he submitted a second request (request two) about policies:

*"1. Are you able to provide me with the all the policies and handbooks pertaining to Occupational Health?*

*2. More specifically, can you direct me to the specific policy where patient consent and confidentiality are not required prior to the formation of a medical diagnosis/advice?*

*3. As per the previous question, can you outline the circumstances, supported by the specific policy, when management are able to waive patient confidentiality and access a diagnosis/advice pertaining to an*

*employee without patient consent?*

*4. Can you outline the circumstances, supported by the specific policy, when an Occupational Health practitioner is able to override the diagnosis and treatment outlined by another medical professional directly involved with that patient without any consultation with said medical professional [sic] or the patient?*

*5. Can you outline the circumstances, supported by the specific policy, when management are authorised to present medical information about an employee to Occupational Health without confirmation of the patients consent?*

*6. Can you outline the circumstances, supported by the specific policy, when any OH report is requested by management without the patient consent and without the said patient having any visibility of that report?"*

6. TfL responded on 14 June 2019, confirming that it held the information but aggregating the requests and citing section 12 – the cost of compliance exceeds the appropriate limit as its basis for refusing the request. It explained that the second point in part 3 of request one about the number of employees with disabilities in the different business areas would require it to interrogate the personal records and data for around 10,000 employees who had been involved to some extent in the Transformation process to ascertain which employees had identified that they had a disability and had asked to have this information placed on their personnel records. TfL also explained its view that question one of request one and questions three to six of request two did not fall under the FOIA as they would require the creation of new information or the provision of a judgement, explanation, advice or opinion that was not already recorded at the time.
7. The complainant requested an internal review on 17 June 2019 by expressing dissatisfaction with the response to his request for information. He submitted revised questions for both requests for all except question three of request one and question one of request two. He also requested further information about documentation regarding TfL's equality duties.
8. TfL sent him the outcome of its internal review on 15 July 2019. TfL upheld its original position regarding requests one and two. It also provided a list of 'Transformative Workstreams' in response to his further request for information of 17 June 2019. TfL additionally responded to the complainant's analysis of how the requested data could

be obtained and denied that it would be possible to obtain it in the way he had outlined.

## **Scope of the case**

---

9. The complainant contacted the Commissioner on 24 July 2019 to complain about the way his request for information had been handled.
10. The Commissioner considers the scope of this case to be TfL's citing of section 12(1) FOIA in relation to question three of request one submitted on 23 May 2019 and whether the cost of compliance would exceed the appropriate limit. She will also look at what advice and assistance was offered to the complainant, as set out in section 16 FOIA.

## **Reasons for decision**

---

### **Section 12 – cost of compliance exceeds the appropriate limit**

11. Section 12(1) of the FOIA states that:

*"(1) Section 1(1) does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit."*

12. The appropriate limit is set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 ('the Fees Regulations'). The appropriate limit is currently £600 for central government departments and £450 for all other public authorities. The Fees Regulations also specify that the cost of complying with a request must be calculated at the rate of £25 per hour. This means that in practical terms there is a time limit of 18 hours in respect of TfL or £450. In estimating whether complying with a request would exceed the appropriate limit, Regulation 4(3) of the Fees Regulations states that an authority can only take into account the costs it reasonably expects to incur during the following processes:

- determining whether it holds the information;
- locating the information, or a document containing it;
- retrieving the information, or a document containing it; and

- extracting the information from a document containing it.
13. A public authority does not have to make a precise calculation of the costs of complying with a request; instead only an estimate is required. However, it must be a reasonable estimate. In accordance with the First-Tier Tribunal in the case of *Randall v IC & Medicines and Healthcare Products Regulatory Agency* EA/2007/0004, the Commissioner considers that any estimate must be 'sensible, realistic and supported by cogent evidence'.<sup>1</sup>

### **The complainant's view**

14. When the complainant requested a review from TfL he estimated that it would take six hours and thirty minutes to fulfil the whole of his 23 May 2019 requests. He suggested the following fields as key filters regarding the second part of part three of request one:
- **Cost Centre** - All employees are allocated to a cost centre and it is a basic task to filter all employees by the relevant cost centres affected by Transformation. He disputes that such a task would require TfL to interrogate 10,000 staff personnel records and stated that there is an existing report in its records system (known as SAP) which already exists.
  - **Disability** - All employees who have disclosed a disability should have a key field recording that data as part of their staff record. By filtering this specific field, TfL could identify how many employees have disabilities. The complainant states that such a report already exists.
  - **Reasonable Adjustments** – the complainant suggests that employees who have disclosed a disability and require reasonable adjustments should have a key field recording that data as part of their staff record. By filtering on this specific field, the number of employees who have a disclosed disability and required reasonable adjustments could be identified. The complainant states that there is an existing report which provides this information.
  - **Employee Numbers** - All Employees have a unique employee number and all the relevant reports outlined above can be linked

---

<sup>1</sup> <http://informationrights.decisions.tribunals.gov.uk/DBFiles/Decision/i136/Randall.pdf>  
(para 12)

by this. It would not take an inordinate amount of time and anyone with a basic understanding of Excel could do this.

The complainant contended that it would be a relatively simple task to link three data downloads from three reports which already exist and to link them by employee number and cost centre. Subtotalling the relevant data is straightforward. TfL could then collate the amounts by business area in line with the request.

15. After the Commissioner had provided the complainant with her initial view, he provided further argument. His view is based on his knowledge of the systems at TfL. He reiterated that he had provided TfL with reasons how the information could be compiled within the fees limit. His view is that HR are the wrong people to speak to about it as they do not compile these reports. He maintains that this is done by SAP support who develop bespoke reports if one is not available in the suite of reports. HR is best placed to provide policies, though these have not been provided.
16. The complainant further contends that TfL has a staff listing of all employees in a single report. He queries the idea that the report has ever had 50-60,000 employees on it. He argues that Transformation does not go back ten years and commenced around 2016/7 and he provided links to support his view<sup>2</sup>. The complainant suggests that these links provide a detailed explanation of what Transformation is and the areas it affects and when it was to be completed which he states is between 2016 and 2019. As such, he argues that the task is about limiting records to that period and cross-referencing the list of staff with the list of people who have a disability. His view is that this is easy and straightforward. After that, compiling it by business organisation is also straightforward and then it can be filtered by cost centre. There is no need for manual intervention to provide this information. Overall, the complainant suggests that TfL's estimate is not credible and that it would have needed to compile this data to fulfil its Equality Act 2010

---

<sup>2</sup> <https://www.london.gov.uk/questions/2018/0501>

<https://www.london.gov.uk/questions/2017/5122>

<https://www.london.gov.uk/questions/2017/5127>

<https://www.london.gov.uk/questions/2017/512>

obligations around completing a disability impact assessment during the Transformation reorganisation.

**TfL's view**

17. Firstly, TfL provided the Commissioner with some context by way of assistance. It explained that TfL employs approximately 28,000 staff and that it needed to evolve and prioritise its commitments and vision for future transport enhancements. There is continuing change within TfL and over the last ten years it has been through two significant organisation-wide restructures, the first one known as 'Horizon' and the more recent one, 'Transformation'. These identified various teams within departments across TfL that required review and changes where necessary in structure and/or personnel to deliver improvements. These could have included "head count reduction" or amalgamation into other existing teams .
18. TfL explained that it had aggregated the two requests and stated that this met all the conditions laid out in the fees regulations and the ICO guidance on the aggregation of requests:
  - the requests were made by one person,
  - they were made for the same or similar information, and
  - they were received within a period of 60 consecutive days.
19. TfL contended that it had advised the complainant about the predominate issue in providing the information – question three of the first request where he had asked for a breakdown of information regarding disability and equality in all business areas which had been involved in the "Transformation business reorganisation".
20. TfL stated that the reason that this part of the request would exceed the cost limit was due to the fact that the requested information is not recorded in a format where it is possible to run any kind of report to try and start to identify the data. For this reason, it would require a manual search of thousands of staff employee records to try and identify if a disability had been declared by an employee at the time Transformation was taking place. Added to this factor was the issue that many employees would have moved roles within different areas of the organisation or left TfL. This, it concluded, made the complainant's request nearly impossible to try to begin to answer.
21. Even if an individual has knowledge of TfL systems, it is HR who has the expert knowledge on how this information is recorded. The internal review outlined that in order to try and identify, locate and extract the requested information TfL would have to manually interrogate thousands



of employee files spanning an indeterminate period of time as no timeframe had been specified. The request also uses terminology that doesn't exist in its records systems, terms such as "business area". This language is no longer applicable to the organisation and no longer used.

22. TfL points out that the complainant appears to assume that there is a 'trigger' on the system that would indicate when a transformation has taken place. A trigger does not exist that shows when a member of staff has been through transformation. There is only something called an 'organisational change' action record which shows that a move has taken place to another team and/or location. This organisational change record is used for more than just transformation purposes eg a promotion or a move to a new role and therefore cannot be an accurate filter, as the complainant suggested.
23. Locating the requested information would require the identification of the dates of every single transformation that has ever taken place. The dates would then have to be cross-checked with what organisational units were involved in that specific transformation. Then each individual report for each transformation to date would need to be manually located, reviewed and extracted to identify the employee numbers that were involved per transformation. Once the employee numbers were identified, TfL would need to manually locate, review and extract every employee's records at the time the transformation took place to check for any records concerning a disability. TfL state that this has the potential to run into thousands, possibly tens of thousands of records. It maintains that there is no way of obtaining this information as employees can declare disabilities at any time, including prior to and after transformation. TfL cannot just look at employees with current disability records because they may or may not have declared a disability at the time when a transformation took place. HR data requires the use of specific dates as each change that is made to the record is time stamped, therefore when certain filters are run it will give incorrect responses making any possible data inaccurate.
24. TfL provided the complainant with a full list of each of the Transformation Work streams when he requested them. These 'work streams' only show the high level terminology used to describe an overall 'business area' where transformation is taking place and it gives the example of Finance or Commercial. TfL further explained that each business area comprises of multiple teams which may or may not be affected by any transformation within the business area. The work streams include references that are not the specific terms used for information recording purposes on the system. 'Tech and Data' for example is a widely used, high level description within TfL and groups together a large range of teams. The specific term itself does not



actually exist in the organisational structure recorded on the system but is just terminology used within the organisation. This high level terminology used for work streams means that not necessarily all of that area of the business went through the transformation process. The list provided to the complainant shows 'Finance' as the first work stream. This does not make it clear as to whether the whole of Finance went through transformation or only part of it. The only way of establishing who went through the transformation process, would require a list of all the organisational units involved in each individual transformation but it does not hold this data centrally and has no direct indicators in its system to use as identifiers. It has no defined starting point to begin to try and identify the data that is being requested.

25. TfL organisation structures are 'owned' by the Directors of each structure which means that they can be continually changed, as and when required. The process when a 'transformation' is identified and was being completed meant that a Director worked with a specifically assigned HR business partner to obtain reports of the area they wanted to 'transform' in order that they could continue to complete the transformation process themselves. TfL states that this data was not centrally recorded by the assigned business partner as it was not a requirement to do so. It does not hold a record of these specific lists of organisational units. Many of the Directors and HR business partners involved in the historic transformations are no longer with TfL and cannot provide the necessary information. Therefore TfL holds historic employee data on its systems but is not able to run the reports that would provide the requested information because it does not have the fundamental starting information.
26. Should TfL have a full list of the organisational units involved to allow it to determine the search criteria and parameters, it would then need to extract all historic reports for those organisational units who went through the transformation process to identify all of the individuals involved historically and then manually review their staff records in order to identify whether they had declared a disability at the time of the transformation or not. TfL cannot simply filter by using the key word 'disability' as a disability may have been declared after transformation had been completed. This data would then need to be filtered out as it would fall outside the scope of the request.
27. TfL summarised that in order to provide the requested information it would need to ascertain every instance of organisational change over an unspecified timeframe. It would then need to identify any and all employees who were directly affected by that organisational change. Lastly, it would need to manual review thousands of employee files to ascertain whether they have at any point declared a disability and then

correlate the date of those declarations against the timings of and related transformation in the area in which they worked at the time it was going through transformation.

28. TfL first told the Commissioner that to locate, extract and collate the relevant information would vastly exceed 18 hours but could not quantify. It addressed the four ways in which the complainant had advised that the search could be reported on. TfL contended that one method was completely incorrect. The remaining three methods pertained to information that the complainant hadn't actually asked for in his original 23 May 2019 requests and had not formed part of the internal review considerations for that reason. TfL had provided the information the complainant asked for in his additional FOI request, including a list of Transformation Work streams in its internal review response and had offered to provide full copies of any of the work streams named on the list, if required. The complainant, it argued, had refuted the detailed explanations concerning its recording systems and the issues faced when trying to address the requests, and asked to see all the listed work streams which it had then provided.
29. Later, TfL responded again to the Commissioner who had asked for a more specific breakdown regarding the cost of compliance. It explained that it would firstly need to ascertain every instance of organisational change over an unspecified period of time to identify any and all employees who were directly affected by that organisational change, ascertain whether they had, at any point, declared a disability and then correlate the date(s) of those declarations against the timings of any related transformation in the area in which they worked at the time it was going through that process. To do so would require TfL to manually review in excess of 28,000 employee files.
30. TfL said that this figure is just the current employees of TfL who may have potentially been affected by an organisational change in the last ten years. There would be additional files of employees who have since left the organisation that would also need to be identified. However, basing its figures just on the 28,000 current employees using what TfL describes as a "conservative" estimate of two minutes per employee file, it would equate to over 930 hours of staff time and resource to locate, identify and extract the required information which would then enable TfL to run the required reports from its recording system to try and collate the information. It further explained that it had not conducted a sampling exercise as the 18 hour limit was so significantly exceeded, just on the strength of the two minute estimate and it was highly likely it would take longer.

31. The Commissioner subsequently asked further questions from TfL. Firstly, she queried the need to interrogate all 28,000 employee records. She asked if TfL had considered conducting an initial search of all employees who have had or had a disability listed during the whole timeline of the Transformation 'from and to'. She asked if TfL could then have cross-referenced the list with the organisational change search dates that TfL had explained would need to be compiled in order to determine the dates that the various departments underwent Transformation, then review the individual records to see if the individual employee had declared a disability at that time. The Commissioner suggested that this may mean TfL had less records to review.
32. The Commissioner then spoke to TfL in order to be able to assess the cost estimate. TfL stated that Transformation is ongoing and has been for the past ten years, it was previously named 'Horizon'. The newest phase has been going on for three to four years. TfL argued that the complainant is interested in data from ten years ago, not just the most recent data. TfL does not hold the data for each department centrally. As previously outlined, there may also be groups within broader groups. Not all of these smaller groups will have undergone Transformation at the same time or were even affected. However, almost all parts of the organisation have been through Transformation from the start of the process. The calculation related to current employees only but thousands of employees have come and gone over the past ten years and the request covers these past employees too. The data would have to be compiled from a number of sources and, as personnel have left and some were allocated to Directors on a temporary basis, this made the task more lengthy. TfL could not provide an accurate figure but it would be in excess of the 18 hour limit.
33. The Commissioner went on to discuss some of the issues with providing the requested information with a member of staff familiar with TfL's systems and how complex the data analysis would be to provide what the complainant had requested. Some of the same ground was covered but there were additional points made that provided the Commissioner with further reasons behind why TfL could not interrogate its systems to produce an accurate response to part three of the first request. Her understanding is as follows:
  - Over ten years the request could include 50-60,000 personnel records. Turnover of staff is 8-9% per year.
  - Transformation consists of organisational change including the merging of departments, creation of new functions and both voluntary and compulsory severances.

- Most of the existing workforce will have gone through some form of Transformation in the last five years, except very new members of staff. These changes are ongoing.
- The requests submitted by the complainant have been reviewed by several departments, including the Transformation department. Human Resources have been heavily involved in the response.
- It has been a recent development that a Transformation team exists. Before it was set up, changes were made at a local level in organisational units.
- All employees are linked in the personnel system to an organisational structure and organisation units. These units are the focus of Transformation as they have been changed and restructured.
- Consultants left after their projects were complete.
- Due to the age of the data, some of it may not be held. There would be no business use to keep very old data regarding Transformation.
- Information regarding Transformation is not stored centrally by TfL, but is held by the individual organisation units. This means that it is not a quick and easy exercise to run reports on the system and extract large amounts of both present and historical data, as it would need to be retrieved by each unit and collated centrally.
- An employee may move around the organisation voluntarily by moving job roles, or as a result of Transformation. This is logged as an 'Organisational Change' on the personnel record of each employee. This is not differentiated on the record to specify what kind of change it is.
- The most logical approach to this request would be to obtain the dates of Transformation from each Director. There are currently over 1400 organisation units which would need to be contacted to determine this information.
- The time reference within which the data needs to be analysed is the date they started an organisational unit and the date an employee left. This shows all status changes.
- There are too many variables to be able to run formulas that would extract the data for reports to look at disability,

organisational unit and organisational change. It is not possible to do this with the software TfL presently has in place.

- Basic reports can be run to give a snapshot of which employees of TfL are disabled at present, and which have undergone an organisational change, which may include a Transformation. The dates organisations underwent Transformation need to be ascertained before a report for disabled employees can be run. This information is required to cross-reference when an employee was affected by an organisational change, to see if this happened under Transformation. If an employee had been found to belong to an organisational unit when a Transformation happened, the next step would be to find out if they had a declared disability on file at the time.
- Disability data can vary over time, an employee can declare a disability and this can change, eg having depression. If this no longer affects an employee, it would still be on their personnel record, and be timestamped as something that was an issue in the past. Whilst an employee may have declared a disability at one point, they may not have had one recorded at the time they were in an organisational unit that underwent Transformation, rendering it necessary to check disability data against any organisational changes as a result of Transformation. Pieces of data need to be taken into consideration together to be able to gather the data to fulfil the request (disability status, which organisation units they have been part of and when, and when that organisational unit underwent Transformation).
- It is possible to look at the data for those who have had disabilities and produce a report. This would take several hours due to the sheer volume of employees TfL has had over the past 10 years and the way in which the software works. If a report is over 750,000 cells (not rows of data, individual cells contained within that report), the system will stop when it reaches that figure. Therefore, it is not possible to create a report that combines the various data required to obtain the data the complainant is requesting.

### **The Commissioner's view**

34. The complainant does not accept that the two requests he made on 23 May 2019 would exceed the fees limit from his understanding of the systems at TfL. The Commissioner advised the complainant that she accepted TfL's estimate but he did not accept her view.

35. In its internal review TfL addressed the way in which the complainant had suggested that the information at the second point of part three of the first request could be provided. Regarding the 'cost centre' (paragraph 14), TfL said that the complainant's view was incorrect. Firstly, each employee holds a position which is assigned to an 'org unit', not a cost centre. Filtering by cost centre would not provide accurate data as not all employees appear in cost centres due to the fact that not all employees hold full time employment. Secondly, there is no 'flag' in the records system which states 'transformation' as the recording method is used for any type of change. TfL would need to know the specific dates of the 'org change' to allow it to locate the individuals that were in the 'org units' at the time of the change to see what their characteristics were at that exact time. TfL stated that there was no existing report showing this data.
36. Disability (see paragraph 14). TfL said that the complainant was correct except that his question asked for the data of those disabled at the time of the transformation. It would have to manually check when they disclosed this data to HR. TfL could not assume that an employee who has declared as having a disability today also had a disability at some point over the last ten years when they went through Transformation without manually reviewing their file to see whether they had declared it at that time.
37. Reasonable Adjustments (see paragraph 14). TfL stated that neither of the 23 May 2019 requests had asked for information concerning reasonable adjustments.
38. Employee Numbers (see paragraph 14). TfL said that it would not be able to provide this information had it been requested as it would be a breach of data protection legislation (by this the Commissioner understands TfL to mean a unique employee number that could lead to identification). TfL again pointed out that the aggregated requests did not ask for employee numbers and the issue of personal data has not been considered in this decision notice. The problem still remained with sourcing employee numbers which specifically related to the time of transformation.
39. Regarding the Equality Impact Assessment (EQIA), TfL explained that it does complete an EQIA for each transformation but that they are not centrally recorded and are owned and held by each business area across the organisation who are supported by HR Services. TfL said that where a particular business partner involved in that employee's transformation should be an information source, due to the lack of a specified time period many of the business partners are no longer with TfL. HR would be unable to capture all the information that would fall within the scope



of the request. Since February 2017 alone, there have been 50 transformation programmes. TfL states that this would mean they would need to run the data for the date ranges of Transformation 50 times, as well as run the employee reports for those areas from the tables, as it would need exact time stamps of the data.

40. Firstly, the Commissioner agrees that it was appropriate for TfL to aggregate the requests received on the same date for the reasons specified by TfL in paragraph 18.
41. The Commissioner has, however, certain questions marks over TfL's responses. TfL believes that it needs to go back some ten years in order to include 'Horizon' which appears to have been a previous transformation process. The complainant has made it clear to the Commissioner that he sees the 'Transformation' as dating from 2016/17. However, it is not clear if he has specified this at any point to TfL, though the issue of timeframe was raised by TfL. Potentially there is a problem with the interpretation of the scope of the request on both sides. There is also a fundamental disagreement over what data can be extracted from the system to fulfil the request.
42. Despite this, the Commissioner has concluded that providing the information for part three of the first request would exceed the appropriate limit to search for, locate, retrieve and extract this information going back to 2016/17 alone. Given the number of TfL's 'current' employees (approximately 28,000), the records to be searched and the initial searches that would be required before employee records could be scrutinised, she accepts TfL's view that the appropriate limit would be exceeded. Even working from the lower figure of 10,000 employee records referred to by TfL in its refusal notice, would still take the request well over the fees limit.
43. Whilst TfL may have the building blocks to fulfil the request, the nature and structure of the organisation, the IT systems and how the personnel data is stored would take it far beyond the timeframe allowed by the legislation. Once one part of a request exceeds the fees limit there is no requirement to provide any of the remaining request information to a complainant.

## **Section 16 – duty to provide advice and assistance**

44. Section 16 of the FOIA states:

*"(1) It shall be the duty of a public authority to provide advice and assistance, so far as it would be reasonable to expect the authority to do so, to persons who propose to make, or have made, requests*



*for information to it.*

*(2) Any public authority which, in relation to the provision of advice or assistance in any case, conforms with the code of practice under section 45 is to be taken to comply with the duty imposed by subsection (1) in relation to that case."*

45. In its refusal notice, TfL explained that part three of the first request would bring it over the appropriate limit. TfL suggested that the complainant could consider narrowing or limiting his request in terms of time, geographic area or specific department. TfL also advised that it could answer the parts of his requests in relation to the provision of policies if he wished to narrow his focus to them. The internal review stated that the complainant had not restricted the timeframe and that some of the terminology used no longer applied to how TfL operated. The review attempted to answer the points the complainant had made in his review request and provide helpful advice and assistance.

## **Right of appeal**

---

46. 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: 0203 936 8963

Fax: 0870 739 5836

Email: [grc@justice.gov.uk](mailto:grc@justice.gov.uk)

Website: [www.justice.gov.uk/tribunals/general-regulatory-chamber](http://www.justice.gov.uk/tribunals/general-regulatory-chamber)

47. 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.
48. 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 .....**

**Janine Gregory**  
**Senior Case Officer**  
**Information Commissioner's Office**  
**Wycliffe House**  
**Water Lane**  
**Wilmslow**  
**Cheshire**  
**SK9 5AF**