

Freedom of Information Act 2000 (FOIA)
Environmental Information Regulations 2004 (EIR)
Decision notice

Date: 11 March 2022

Public Authority: Financial Conduct Authority
Address: 12 Endeavour Square
London
E20 1JN

Decision (including any steps ordered)

1. The complainant has requested findings from two reviews conducted by the Financial Conduct Authority (FCA) into the governance arrangements of host Authorised Corporate Directors of investment funds. The FCA provided some redacted documents but withheld information from these under section 43(2), 44 and 31(1)(g) of the FOIA.
2. The Commissioner's decision is that the information withheld under sections 31(1)(g) and 44(1)(a) has been correctly withheld from disclosure. With regard to section 43(2) the Commissioner finds the exemption has been correctly engaged but the balance of the public interest favours disclosure. The Commissioner also finds the FCA failed to complete its deliberations on the balance of the public interest within a reasonable time and therefore breached section 17(3) of the FOIA.
3. The Commissioner requires the public authority to take the following steps to ensure compliance with the legislation.
 - Disclose the information highlighted in the redacted documents as engaging section 43(2) of the FOIA.
4. The public authority must take these steps within 35 calendar days of the date of this decision notice. Failure to comply may result in the Commissioner making written certification of this fact to the High Court pursuant to section 54 of the Act and may be dealt with as a contempt of court.

Request and response

5. On 14 January 2020 the complainant made a request to the FCA for information in the following terms:

“Re: FCA review of effectiveness of governance arrangements at Host ACDs 2019/20. According to the FCA press office the FSA/FCA has twice previously conducted reviews of ACD effectiveness in 2012 and 2014. I would like the results of these reviews.”
6. On 10 February 2020 the FCA wrote to the complainant for clarification of the request. The FCA asked for clarification as to what ‘results’ referred to, specifically if this meant findings or actions taken by the FCA as result of the reviews.
7. The complainant clarified their request on 11 February 2020 as follows:

“Re: FCA review of effectiveness of governance arrangements at Host ACDs 2019/20. According to the FCA press office the FSA/FCA 2 has twice previously conducted reviews of ACD effectiveness in 2012 and 2014. I would like the findings of these reviews and any actions taken by the FCA as a result.”
8. The FCA responded on 29 September 2020 after a lengthy delay to consider the public interest arguments relevant to section 31 of the FOIA. However the FCA explained it had concluded that section 31 did not apply but that section 44 applied to some of the information and section 43 also applied.
9. The complainant requested an internal review on 1 October 2020, raising particular issue with the application of section 43 of the FOIA due to the historic nature of the reviews and the public interest in disclosure.
10. The FCA conducted an internal review and responded on 21 April 2021. Following the review the FCA concluded that some information could be disclosed and provided this to the complainant. However, the FCA maintained that section 44 and 43 still provided a basis for withholding the remaining information. The FCA also stated it now considered again that section 31 would apply to some of the information.

Scope of the case

11. The complainant contacted the Commissioner on 9 June 2021 to complain about the way their request for information had been handled.

12. The Commissioner considers the scope of his investigation to be to determine what information is held by the FCA and whether the FCA has correctly withheld this information under any of the cited exemptions – sections 31, 43 and 44 of the FOIA.

Background

13. The request refers to the FCA's review of governance arrangements at Authorised Fund Management Firms (AFMs), referred to in the request as ACDs (Authorised Corporate Directors). The request asked for the findings of reviews into two AFMs in 2012 and 2014.
14. The FCA has explained that it conducted two multi-firm reviews in 2012 and 2014. Individual feedback was provided to the firms the FCA visited as well as other follow-up work but wider communications were not made. A third multi-firm review was undertaken in 2019-2020 and the findings were detailed on the FCA website¹.

Reasons for decision

15. The FCA did disclose redacted information to the complainant following the internal review. The information that has been redacted from the documents provided is the subject of this notice and the FCA has provided the Commissioner with full unredacted copies of the documents, detailing where each exemption has been applied. The Commissioner has reviewed this information and will outline his position on each exemption in turn.

Section 43 – commercial interests

16. Section 43(2) of FOIA states:

“Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).”

17. In order for a prejudice based exemption, such as section 43, to be engaged the Commissioner believes that three criteria must be met:

¹ [FCA review finds weaknesses in some 'host' Authorised Fund Management firms' governance and operations | FCA](#)

- Firstly, the actual harm which the public authority alleges would, or would be likely to, occur if the withheld information was disclosed has to relate to the applicable interests within the relevant exemption;
 - Secondly, the public authority must be able to demonstrate that some causal relationship exists between the potential disclosure of the information being withheld and the prejudice which the exemption is designed to protect. Furthermore, the resultant prejudice which is alleged should be real, actual or of substance; and
 - Thirdly, it is necessary to establish whether the level of likelihood of prejudice being relied upon by the public authority is met, ie disclosure 'would be likely' to result in prejudice or disclosure or 'would' result in prejudice. In relation to the lower threshold, the Commissioner considers that the chance of prejudice occurring must be a real and significant risk. With regard to the higher threshold, in the Commissioner's view this places a stronger evidential burden on the public authority. The anticipated prejudice must be more likely than not.
18. The FCA has explained the party whose commercial interests would be likely to be prejudiced by disclosure is the host ACDs who participated in the 2012 and 2014 reviews. The information withheld under this exemption consists of material obtained by the FCA during the course of its supervision of the host ACDs and the FCA's analysis and opinions of that information as it relates to the conduct of the host ACD. The FCA has argued the host ACDs in question will have a reasonable expectation that such information would be kept confidential by the FCA.
19. The FCA considers that disclosure of the withheld information would be likely to cause commercial prejudice to the host ACDs and that this prejudice is not trivial or insignificant and would have harmful consequences. Public disclosure of opinions, views or judgements of the FCA could be interpreted negatively by external commentators and third parties and result in harm to the commercial interests of the host ACDs in circumstances where they will not have had an opportunity to comment publicly on those opinions.
20. The FCA has approached the firms involved in the reviews and has received consent to full or partial disclosure of the withheld information in some cases. However, a number of firms still opposed disclosure, in part or in full and have provided more detailed arguments to support the view that they would suffer commercial prejudice from the information being made public.

21. The host ACDs argue that their sector is small and competitive but only a small number of firms are scrutinised within the documents. The belief is that any negative information relating to any of these firms will have significant reputational and financial repercussions for these firms, regardless of whether the information is accurate or not. This could lead competitors to be seen in a more advantageous light.
22. The ACDs who objected to disclosure also argued that public knowledge of any perceived weaknesses in governance would be likely to weaken a company's credibility and influence over its existing business relationships. Prospective business relationships could also be affected as it is expected that an ACD has a strong reputation and track record with respect to good corporate governance and risk management. Publication of comments made by the FCA on a company's risk managements, oversight and governance structures, even historic, would be likely to damage a firm's reputation and their ability to attract new business relationships.
23. The FCA has provided the Commissioner with additional comments from the host ACDs which he has not reproduced in this notice as they are specific to those firms but the Commissioner accepts that these comments do demonstrate there is a real and tangible risk of the prejudice occurring should the information be disclosed and that this is based on previous knowledge of prejudicial effects occurring from similar information being made public.
24. The Commissioner notes that the information withheld under this exemption does also reveal details of business strategies. The ACDs have argued that despite this information being from several years ago it is still valid today and would still have a prejudicial effect on their commercial operations should it be disclosed.
25. It is also important to note that the withheld information reflects the FCAs position at that point in time and does not reflect any challenge or clarification that may have occurred subsequently. It is argued that had any of the firms been aware that information would be disclosed and was not solely for the FCAs internal use then there would have been more of a challenge from the firms to provide greater context to the comments made.
26. With regard to the first criterion of the three limb test, the Commissioner accepts the potential prejudice described by the host ACDs and the FCA does relate to the interests which the exemption at section 43(2) is designed to protect.
27. With regard to the second and third criteria; the Commissioner is satisfied the disclosure of the information withheld under this exemption

has the potential to harm the commercial interests of the companies by impacting on their reputations and their relationships with current and prospective business relationships. Clear examples to demonstrate this have been provided and the Commissioner has concluded that disclosing comments on firms' governance arrangements and risk management is likely to have a negative impact on those firms whether rightly or wrongly. In the Commissioner's opinion it is plausible to argue that this could risk harming their commercial interests and he accepts there is a more than hypothetical risk of prejudice occurring. He is therefore satisfied there is a causal link between disclosure of the information and the host ACDs commercial interests and there is a real risk of prejudice occurring.

28. The Commissioner is therefore satisfied that section 43(2) is engaged to all of the comments and information identified by the FCA as they would identify and likely harm the commercial interests of the firms. He has now gone on to consider the public interest test.
29. The FCA acknowledges there is a public interest in transparency, particularly around the regulatory compliance of ACDs. Disclosure would reassure the public about the FCA's supervision of the markets and firms operating in the financial services industry. In addition disclosure could enable host ACDs and the public to better understand how and why the FCA makes decisions on regulatory matters and on the FCA's use of its statutory powers. It would also provide information to consumers to assist them in making decisions about their dealings with firms operating in the ACD sector.
30. However, the FCA considers this is outweighed by the public interest in encouraging ACDs to be open with the FCA, to participate in reviews and not to suffer commercial detriment for complying in a review with the FCA. There is no routine public disclosure of the information the FCA holds about specific firm so a disclosure would place host ACDs at a disadvantage against those firms whose information has not been disclosed. The FCA further argues that consumer confidence in an ACD may be affected resulting in retail consumers withdrawing their investments from funds held by host ACDs.
31. The complainant argues that the information is historic so it will have lost some of its sensitivity and the public interest in knowing which firms were flagged in the reviews is greater than any commercial sensitivity as investors have a right to know if the firms tasked with protecting their investments are not carrying out their guardian role correctly.
32. The complainant considers there is a significant public interest in the actions of the FCA in 2012 and 2014 given that issues have come to light again. The complainant referenced the Link/Woodford investigation

and argued that the public had a right to know if action taken by the FCA could have prevented this. The Commissioner understands that this refers to the suspension of the LF Woodford Equity Income Fund in June 2019².

33. The Commissioner understands that ACDs are authorised firms with regulatory responsibility for the operation and oversight of Open-Ended Investment Companies (OEICs). A fund's ACD can operate within the same group as the firm or an unconnected, third party 'Host ACD' can act as the fund's ACD. The case referred to by the complainant involved an ACD, Link Fund Solutions, that oversaw Woodford Investment Management's funds.
34. The Commissioner also notes that whilst the information that is being withheld under section 43(2) does refer to host ACDs and discusses details of their business strategies it does not name the host ACDs. Where they are referred to by name the FCA is relying on other exemptions that will be discussed later in this notice. That being said, the sector is small and there is only a number of ACDs and even fewer host ACDs so the argument that there would be prejudice to the sector as a whole remains valid. However, the extent of this prejudice is likely diminished by the age of the information and therefore the public interest arguments for withholding this information are also reduced.
35. The Commissioner accepts the argument from the complainant that there is a public interest in understanding the findings of the reviews from 2012 and 2014, particularly as these focused on governance arrangements and in view of the issues that have come to light. The Commissioner is mindful that the FCA does need to engage with firms in an free and frank manner to discharge its functions effectively but he is not convinced that disclosing information from 2012 and 2014 would undermine its ability to do this given the historic nature of the information. Disclosure would, however, give an insight into the extent of any concerns the FCA had about host ACDs in the past and provide much greater transparency and accountability in an area that has seen an increase of attention in the last few years.
36. The Commissioner therefore finds on balance that the arguments for disclosure are more compelling in this case and he considers that although there is a risk of some commercial prejudice to the firms involved in the review, this is mitigated by the historical nature of the

² [LF Woodford Equity Income Fund investigation | FCA](#)

information and the fact they are not specifically referred to by name in the information withheld under this exemption.

37. The Commissioner therefore has concluded that although the section 43(2) exemption is correctly engaged in relation to the information identified by the FCA, the balance of the public interest favours disclosure. He now requires the FCA to disclose the information the FCA has highlighted under this exemption.

Section 44 – statutory prohibitions on disclosure

38. Section 44 of the FOIA states that:

“(1) Information is exempt information if its disclosure (otherwise than under this Act) by the public authority holding it –

- (a) is prohibited by or under any enactment,
- (b) is incompatible with any retained EU obligation, or
- (c) would constitute or be punishable as a contempt of court.”

39. The FCA has identified information in the review documents that it argues is subject to a statutory prohibition on disclosure. The FCA has argued that disclosure of this information is prohibited by the Financial Services and Markets Act 2000 (FSMA) and is exempt under section 44(1)(a) of the FOIA.

40. Section 348(2) of the FSMA states that “confidential information” means information which –

- a) relates to the business or other affairs of any person;
- b) was received by the primary recipient for the purposes of, or in discharge of, any functions of the FCA; and
- c) is not prevented from being confidential information by subsection (4).

41. Section 348(4) of the FSMA states that information is not “confidential information” if –

- a) it has been made available to the public by virtue of being disclosed in any circumstances in which, or for any purposes for which, disclosure is not precluded by this section; or
- b) it is in the form of a summary or collection of information so framed that it is not possible to ascertain from it information relating to any particular person.

42. Section 349 provides some limited gateways to disclosure of confidential information, none of which relate to disclosure to the world at large. Section 352 of the FSMA makes it a criminal offence to disclose confidential information otherwise than in accordance with the FSMA.
43. The FCA confirmed that parts of the information subject to the request constituted "confidential information" within section 348(2) of the FSMA as the information was received by the FCA from the host ACDs as part of the arrangements the FCA has in place for carrying out supervisory functions under section 1L of the FSMA. The information was related to the business or affairs of the host ACD and was not otherwise publicly available.
44. The FCA explained that its experience with third parties about the FCA disclosing information obtained from them or about them, in response to information requests under FOIA, is overwhelmingly that they are opposed to any disclosure. This is given the importance those operating in the financial services sector attach to the information they provide the FCA; and the wider consequences that any damaging disclosures might have on the financial markets more generally. There is no reason to consider that the providers of the underlying information, and, if different, the persons to whom it relates, would react differently to the present request. Therefore, in terms of consent, the FCA confirmed that it does not hold consent to the disclosure of the requested confidential information that is restricted from disclosure under section 348 of FSMA.
45. Section 348(4) of the FSMA states the information is not confidential if it has been made available to the public or it can be summarised in a way that prevents it from being related to a particular person. The Commissioner does not consider either of these circumstances have been met so he accepts the information is confidential information.
46. Upon viewing the information withheld under section 44(1)(a) the Commissioner's view is that the FCA has correctly applied section 44(1)(a) as the information is "confidential" and was obtained directly from the host ACDs in the course of the FCA carrying out its supervisory functions under the FSMA.
47. Section 44(1)(a) is an absolute exemption and is not therefore subject to the public interest test so the Commissioner finds the information withheld under this exemption by the FCA has correctly been withheld.

Section 31 – law enforcement

48. Under subsection 31(1)(g) of the FOIA information is exempt information if its disclosure would, or would be likely to, prejudice the exercise of any public authority of its functions for any of the purposes

specified in subsection 31(2). The purpose listed in section 31(2) that the FCA has cited is:

"31(2)(c) ascertaining whether circumstances which would justify regulatory action in pursuance of any enactment exist or may arise."

49. In order for a prejudice-based exemption such as section 31 to be engaged, there must be at least a likelihood that disclosure would cause prejudice to the interest or interests that the exemption protects. In the Commissioner's view, three criteria must be met in order to engage a prejudice-based exemption:

- The harm that public authority states would, or would be likely to, occur if the information was disclosed must be relevant to the applicable interests protected by the exemption;
- The public authority must be able to demonstrate there is a causal relationship between the potential disclosure of the information and the prejudice which the exemption is designed to protect. This prejudice must be real, actual or of substance; and
- The public authority should establish whether the level of likelihood of prejudice it is relying on is the lower threshold of 'would be likely to prejudice' or the higher threshold of 'would prejudice' and be able to demonstrate this.

50. The Commissioner has first considered whether the FCA is formally tasked with functions for the purpose set out in section 31(2).

51. In its submission to the Commissioner, the FCA has provided some information on its statutory objectives and functions that are set out in section 1L of the FSMA.

52. This section sets out the supervisory functions of the FCA. In particular:

"1L Supervision, monitoring and enforcement

(1) The FCA must maintain arrangements for supervising authorised persons.

(2) The FCA must maintain arrangements designed to enable it to determine whether persons other than authorised persons are complying—

(a) with requirements imposed on them by or under this Act, in cases where the FCA is the appropriate regulator for the purposes of Part 14 (disciplinary measures), . . ."

53. Therefore the Commissioner accepts that the FCA is formally tasked with functions as set out in section 31(2)(c) of the FOIA and has now gone on to consider the likelihood of prejudice occurring to the exercise of these functions if the withheld information were to be disclosed, and the causal link between disclosure and the occurrence of such prejudice
54. The FCA is of the view that disclosing the information it has identified as engaging this exemption would be likely to result in firms being less willing to cooperate with the FCA in the future reviews for fear that the information they disclose in confidence may be disclosed to public at large. The FCA has pointed to the Commissioner's own guidance on this issue³, in particular paragraphs 102 and 103 which state that investigations:
- "can be aided by either individuals, or organisations providing information to the investigating authority. Where information is volunteered by a confidential source, ie someone who has provided information on the understanding that they will not be identified, the information and identity of its source will be protected by section 30(2) as explained at paragraph 74 above. However, even where the provider of the information is not a confidential source, there is still a public interest in not discouraging others from cooperating with public authorities and supplying them with the information they need on a voluntary basis."
55. It is also argued that disclosure would reduce trust in the FCA as authorised persons, firms or individuals would be less likely to make proactive disclosures of rule breaches or potential breaches to the FCA if they believed such disclosures could be made public. This would impact on the FCAs ability to regulate as there would be less willingness to comply with FCA investigations.
56. The FCA further argues that disclosure would tip off authorised persons, firms or individuals in similar positions as to the FCAs regulatory focus in a particular issue or activity. The FCA considers this may lead to them tailoring responses to the FCAs regulatory enquiries and investigations so as to avoid any further action. The FCA is of the view that keeping firms and individuals unaware and unable to anticipate what will be the focus of a review or monitoring will lead those it supervises to strive for a higher standard of compliance.

³ [law-enforcement-foi-section-31.pdf \(ico.org.uk\)](http://ico.org.uk/law-enforcement-foi-section-31.pdf)

57. The FCA has also argued it needs a 'safe space' to consider the information it gathers during an investigation so it can make quick, efficient and proper decisions about any action it may take. The FCA states it is not in its policy to publish the facts of an investigation or regulatory action except in exceptional circumstances.
58. The FCA has cited a decision of the Information Tribunal⁴ which referred to the FSMA and states at paragraph 11 that the policy of the legislation is that the views of the FCA in relation to the conduct of those it regulates should remain private until a final decision to take enforcement action is reached and even then the FCA should not publish information if it would be 'unfair.'
59. Having viewed the information withheld under this exemption, the Commissioner accepts that it relates to the regulatory functions of the FCA, in particular it discusses strategies and options that the FCA has available to consider. The Commissioner has accepted in previous cases that there are occasions where a regulator needs to create a degree of uncertainty amongst those they regulate as to where its resources may be focused. It is accepted that regulators have, for the most part, a limited amount of resources and they must prioritise accordingly. This will be based on where the most serious concerns are or areas of priority based on current events. The more information about a regulator's allocation of resources or areas of priority that are available the greater the risk that this information can be used by those the FCA regulates to avoid any action.
60. That being said the information is, as already noted, several years old and it is likely that the regulatory landscape will have changed over time and the FCA may have other strategies and focuses. This does diminish some of the arguments presented by the FCA. However, the Commissioner does consider that there is still a need to preserve details of the regulatory process, particularly information that discusses all the options available to the FCA so as not to reveal information that could be used to undermine the FCAs supervisory and regulatory functions. Despite the age of the information, the legislative framework remains the same and there will still be information of relevance.
61. The Commissioner therefore accepts that disclosure of the withheld information would meet the lower threshold of prejudice, i.e. that it would be likely to cause prejudice to the functions of the FCA (as set out in the relevant sections of the FSMA).

⁴ [H- -V1 \(tribunals.gov.uk\)](https://www.tribunals.gov.uk)

62. The Commissioner therefore concludes that the FCA has correctly engaged sections 31(1)(g) by virtue of 31(2)(c) of the FOIA.
63. As the exemption at section 31 is a qualified exemption, the Commissioner has gone on to consider the public interest arguments both in favour of disclosure and of maintaining the exemption
64. The FCA recognises there is a public interest in being open and transparent about the advantage and disadvantages of the regulatory tools it uses to carry out its review and monitoring activities to deliver its operational objectives. Disclosing information would improve the FCA's accountability and facilitate informed comments on the FCA's regulatory and supervisory approach.
65. The FCA also acknowledges disclosure may help the public more generally in making decisions about their dealings or potential dealings with the markets, firms and individuals that are operating in promoting and selling the types of investment schemes in this case.
66. However, against this, the FCA argues there is a strong public interest in it being able to carry out its functions in the most effective manner possible. It argues the information in this case was produced for internal use only and presents the findings of the reviews to senior officers in order for them to assess a range of policy options and is of limited benefit for understanding regulatory action taken.
67. The FCA considers that ad hoc disclosure of information under the FOIA relating to its dealing with host ACDs without a proper understanding of the context and nature of the supervisory tools the FCA uses, has the potential to prejudice the FCA's ability to ascertain whether regulatory action may be needed and this would not be in the public interest.
68. As already discussed with regard to the prejudice test the FCA considers that disclosure could afford host ACDs the opportunity to find 'work-arounds' in their supervisory interactions with the FCA, again this would not be in the public interest as it would undermine the FCA's regulatory action.
69. In terms of the age of the information, the FCA has advanced the argument that the information is not of purely historic value as the FCA was undertaking further work on the same theme involving discussions with host ACDs – it argued disclosure of information relating to earlier reviews could attract adverse comment and divert attention from the current work.
70. The Commissioner places significant weight to the public interest in public authorities such as the FCA being transparent and accountable.

He also consider there is a public interest in informing the public how the FCA discharges its regulatory functions.

71. The Commissioner also gives significant weight to the argument that disclosure would undermine the relationship the FCA has with this sector. He accepts that disclosure of the details of the regulatory aspects of the review may make host ACDs less cooperative with the FCA and also perhaps enable them to avoid any consequences for poor governance if they are familiar with the FCAs methods and framework for assessing compliance. Any impact on the quality of the regulatory process would clearly not be in the public interest.
72. The FCA has informed the Commissioner that it is committed to being as transparent as possible where action is taken. The FCA publishes its handbook of rules, consultation papers and publicises the misconduct of firms through enforcement notices. The Commissioner accepts this goes some way to meeting the public interest in transparency and accountability pro-active publication does provide some insight into how the FCA discharges its functions.
73. The Commissioner considers it is important and very much in the public interest to maintain trust and confidence in the FCA and given the assertions from the FCA that similar conversations are taking place again with host ACDs, he is of the view that disclosing details of regulatory considerations from the reviews could be prejudicial to the FCAs ability to discharge its functions and considering if regulatory action is needed. This would not be in the public interest and the Commissioner does not consider there are public interest arguments for disclosure that are substantive enough to outweigh this.
74. The Commissioner therefore finds, on balance, the public interest is in favour of maintaining the exemption.

Section 17

75. Section 1 of FOIA states that "any person making a request for information to a public authority is entitled to be informed in writing by the public authority whether it holds information of the description specified in the request" and if that is the case, to have that information communicated to him.
76. Section 10(1) provides that a public authority must comply with section 1 promptly and in any event not later than the twentieth working day following the date of receipt of a request for information.
77. Section 17(3) of the FOIA states that where a public authority is relying on a qualified exemption, it can have a 'reasonable' expectation of time

to consider the public interest in maintaining the exemption or disclosing the information.

78. Although the FOIA does not define what constitutes a reasonable time, the Commissioner considers it reasonable to extend the time to provide a full response, including public interest considerations, by up to a further 20 working days. This means that the total time spent dealing with the request should not exceed 40 working days, unless there are exceptional circumstances. A public authority would need to fully justify any extension beyond 40 working days.
79. In this case the complainant made their refined request for information on 11 February 2020. The FCA issues its refusal notice on 29 September 2020, over seven months after the request was submitted. The total time taken by the FCA exceeded 40 working days by a significant amount. The Commissioner does not consider there to be any exceptional circumstances and finds that, by failing to complete its deliberations on the public interest within a reasonable time frame, the FCA has not complied with section 17(3).

Right of appeal

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: 0203 936 8963

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

Jill Hulley
Senior Case Officer
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF