



**IN THE MATTER OF AN APPEAL TO THE FIRST TIER TRIBUNAL (INFORMATION RIGHTS) UNDER SECTION 57 OF THE FREEDOM OF INFORMATION ACT 2000**

EA/2016/0282

**B E T W E E N: -**

**DEPARTMENT FOR HEALTH**

**Appellant**

**-and-**

**THE INFORMATION COMMISSIONER**

**Respondents**

**Heard at: Field House, London:**

**Date of Hearing: 23 & 24 October 2017:**

**Date of Final Decision: 19 July 2018:**

**Before**

**Brian Kennedy QC (Judge)  
Jean Nelson  
John Randall CBE**

**Appearances:**

**Counsel for the Appellant:** James Eadie QC with Ravi Mehta instructed by Natalie Cohen on behalf of the Government Legal Department.

**Counsel for the First Respondent:** Rupert Paines instructed by Clare Nicholson on behalf of the Respondent.

**Subject matter:** Freedom of Information Act 2000, specifically section 35, and 40(2) and by consent an out of time request by the Appellant to argue Sections 35 and 24 are engaged.

**Authorities Considered:**

DOH v IC and Lewis [2017] 1 WLR. 3330: CA [auth/10] (Lewis CA”) at [46]

Savic 2017 UKUT AACR 26.

## **DECISION OF THE FIRST-TIER TRIBUNAL:**

The tribunal allows the appeal in part and substitutes the following Decision.

### **ACTION REQUIRED**

With the exception of the entries identified and referred to in **Paragraph [76]** below, the Department of Health is required to disclose the withheld information within 28 days.

### **REASONS**

#### **Introduction:**

[1] This decision relates to an appeal brought under section 57 of the Freedom of Information Act 2000 (“**the FOIA**”). The appeal is against the decision of the Information Commissioner (“the Commissioner”) contained in a Decision Notice (**DN**) dated 1 November 2016 (reference FS50620879), which is a matter of public record.

[2] The Tribunal sat to consider this case on 23<sup>rd</sup> and 24<sup>th</sup> October 2017 and deliberated as soon thereafter as could be arranged.

#### **Factual Background to this Appeal:**

[3] Full details of the background to this appeal, Dr Gilbert’s request for information and the Commissioner’s decision are set out in the Decision Notice and not repeated here, other than to state that, in brief, the appeal concerns the question of whether the Commissioner was correct to determine that the public interest in disclosing the Ministerial diary for the Secretary of State for Health outweighed the public interest in maintaining the exemption at s35 (1)(d). See also “**Note:**” at Para [4] (1) below.

#### **BRIEF CHRONOLOGY:**

13 Jan 2016            Dr Gilbert requests a copy of a ministerial diary –“*I would like to request the release of a copy of the official ministerial diary of the*

*Secretary of State for Health Jeremy Hunt for the period 1 May 2015 – 13 January 2016.”*

- 20 Jan 2016 Department for Health ('DOH') confirms it holds the material but invokes s35 (1)(d) exemption. Dr Gilbert requests an internal review.
- 14 March 2016 DOH upholds refusal on s35 (1)(d) and adds reliance on s35 (1)(a) Dr Gilbert complains to the Commissioner
- 1 Nov 2016 DN FS50620879 upholding Dr Gilbert's complaint and ordering disclosure – See DN.
- 29 November 2016 The DOH appealed the DN ultimately adding reliance on s35 (1)(b) and s35 (1)(d), s40(2) & s24.

#### **[4] RELEVANT LEGISLATION:**

##### ***s35 Formulation of government policy, etc.***

*(1) Information held by a government department or by the Welsh Assembly Government is exempt information if it relates to—*

- (a) the formulation or development of government policy,*
- (b) Ministerial communications,*
- (c) the provision of advice by any of the Law Officers or any request for the provision of such advice, or*
- (d) the operation of any Ministerial private office.*

**NOTE:** *The general duty (under the FOIA) on a Public Authority to disclose requested information, imposed under s1(1)(b) may not arise where the information is exempt under provisions contained in Part II of the FOIA which allow for Absolute and Qualified exemptions. Section 2 FOIA sets out the effect of that general right of access to information of the absolute and the other exemptions in Part II of FOIA. In particular it sets out the public interest balancing test applicable in the case of those exemptions, which are not absolute exemptions, and which are known as “qualified” exemptions. Where the information is subject to a qualified exemption, it will only be exempted from disclosure if, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information (this is the “public interest test” – see s2 (2) of the FOIA). The class-based nature of the exemption appears to be common ground between the parties in this appeal. However, the general concerns expressed by the DOH appear to*

*seek exemption through the withholding of diary entries in a blanket fashion, and fail to consider the application of the public interest test to the individual diary entries under consideration in this case. This Tribunal is of the view that where those interests are equal, the information must be disclosed: (DOH v IC and Lewis).*

**s40 Personal information.**

*(1) Any information to which a request for information relates is exempt information if it constitutes personal data of which the applicant is the data subject.*

*(2) Any information to which a request for information relates is also exempt information if—*

*(a) it constitutes personal data which do not fall within subsection (1), and*

*(b) either the first or the second condition below is satisfied.*

*(3) The first condition is—*

*(a) in a case where the information falls within any of paragraphs (a) to (d) of the definition of “data” in section 1(1) of the Data Protection Act 1998, that the disclosure of the information to a member of the public otherwise than under this Act would contravene—*

*(i) any of the data protection principles, or*

*(ii) section 10 of that Act (right to prevent processing likely to cause damage or distress), and*

*(b) in any other case, that the disclosure of the information to a member of the public otherwise than under this Act would contravene any of the data protection principles if the exemptions in section 33A(1) of the Data Protection Act 1998 (which relate to manual data held by public authorities) were disregarded.*

*(4) The second condition is that by virtue of any provision of Part IV of the Data Protection Act 1998 the information is exempt from section 7(1)(c) of that Act (data subject’s right of access to personal data).*

**NOTE:** *The parties are wholly or mainly in agreement in relation to the Application of s40 (2) in this appeal and no issue remains.*

**s24(1) National Security.** *“Information which does not fall within section 23(1) is exempt information if exemption from section 1(1)(b) is required for the purpose of safeguarding national security.”*

**COMMISSIONER’S DECISION NOTICE:**

**[5]** Where an exemption is not absolute then the Commissioner must apply a “public interest test”. In applying the public interest test to s35 (1)(d) the Commissioner considered a previous request for the then Secretary of State for Health Andrew Lansley’s diary in which both the Commissioner and Tribunal found that the public interest in disclosure outweighed the public interest in maintaining the section 35(1)(d) exemption.

**[6]** The Commissioner found that the DOH’s arguments that disclosure would undermine the ability of Ministers and their private offices to make diary arrangements do not attract any significant weight. No evidence was presented to suggest that disclosure would impact upon Ministers’ ability to organise their time effectively as the DOH has suggested as diary entries are retrospective. Many of the diary entries in question are very brief and do not necessarily reveal anything about the purpose of the meeting or what is being discussed. Similarly, many of the diary entries are matters of public record for instance, media interviews, and attendance at parliamentary debates, and speeches at public events.

**[7]** DOH also contended that disclosure would negatively impact Ministers’ ability to consider controversial or sensitive issues as they would be inhibited from holding meetings or be unduly pressured into holding unnecessary or inappropriate meetings. The Commissioner utterly rejected this contention, as the Tribunal had in the Lansley case (*Department of Health v IC and Lewis EA/2013/0087* and later [2015] UKUT 159 AAC), as the public would rightly consider politicians to be robust enough to withstand that level of scrutiny.

**[8]** The Commissioner considers that there is significant public interest in promoting accountability by showing whether the public are getting good value from Ministers and the extent to which they are carrying out their functions properly. Disclosure would shed greater light on who has access to Ministers including lobbyists, external organisations and the media, and increase public understanding of how government operates and how Ministers spend their time. At the time of the request the DOH had yet to publish information for all of the period covered by the request. These arguments, in the view of the Commissioner, significantly outweighed the “unconvincing” submissions of DOH.

**[9]** While DOH did not seek to rely upon s40 (2), the Commissioner used her powers as a regulator of the Data Protection Act 1998 to consider whether any individual’s personal data may be captured by this request. Some of the entries in the diary are of a personal nature including details of Mr Hunt’s family engagements and travel

arrangements, amongst other things. She described it as “disappointing and worrying” that the DOH did not seek to apply section 40(2) to what is obviously personal information especially given that the *Lewis* decision strongly suggested that disclosure would be ordered. She ordered redaction of any information capable of identifying an individual in the following circumstances:

- i. any entries relating to the Minister’s personal appointments outwith his role as Secretary of State, a member of the Government or as a Constituency MP;
- ii. the Minister’s travel arrangements;
- iii. the names and contact details of the Minister’s private secretaries and other officials, and their contact details;
- iv. names and contact details for other individuals involved in meetings with the Minister (save where that individual is also an MP); and
- v. notes as to when staff are on annual leave.

## **GROUNDINGS OF APPEAL:**

### ***Section 35(1)(a)***

[10] Disclosure could damage the efficiency or efficacy of policy formation. The need for a safe space for policy development was particularly strong during the period covered by the requested information. DOH cited *Department of Education and Skills v ICO and Evening Standard EA/2006/0006* to support its proposition that discussions of policy options should only be disclosed in extreme situations such as to disclose governmental wrongdoing.

### ***Section 35(1)(d)***

[11] The Commissioner failed to attach appropriate weight to the public interest in maintaining this exemption, as it is in the public interest to ensure that a Minister’s “private office” can function effectively without the “distraction” of potential disclosure of the diary. DOH argued that a Ministerial office “must” function in a way that permits the Minister to meet with groups and individuals on the basis that that fact may not become public knowledge, as without this assurance some may not be willing to engage. The Commissioner also failed to particularise exactly how disclosure of this portion of the Ministerial diary would contribute to public understanding of the Minister’s functions.

## **RESPONSE BY THE COMMISSIONER:**

### ***Section 35(1)(d)***

[12] The Commissioner asserts that her DN contained sufficiently detailed reasons and conclusions as to why she had attributed greater or lesser weight to particular arguments. Regarding the claim that some parties would be reticent to attend meetings if they would be made public knowledge, the Commissioner requested that they be tied to particular diary entries so that she could consider them fully. The promise of particularisation was not at that stage accompanied by any timescale.

### ***Section 35(1)(a)***

[13] The Commissioner reiterated that the weight of public interest arguments will depend on the content and sensitivity of the particular information, and until DOH set out its detailed position regarding each diary entry, the Commissioner was unable to respond in any depth.

## **FURTHER PARTICULARISATION BY THE APPELLANT**

[14] On 28 April 2017, DOH provided a marked-up copy of the disputed information to particularise its position regarding the contents of the diary.

## **FURTHER RESPONSE BY THE COMMISSIONER:**

[15] The Commissioner noted that some of the arguments in the mark-up had only newly been raised, which was of some concern to her given that they had taken so long to reach that position especially given the paucity of detail in the arguments. She was also concerned that no diary entries had been marked up as being outside the scope of the appeal by reason of s40 (2).

[16] In the intervening period, the Court of Appeal had issued its judgment in Lewis [2017] 1 WLR 3330, holding that information is considered to be 'held' by the Department for the purposes of FOIA regardless of whether or not the events in the diary had already occurred, and irrespective of any termination of the incumbent's

Ministerial position by resignation or reshuffle. The Commissioner rejected any argument that the information was not 'held' by the Department.

[17] Having reiterated her position on s40 (2) (whilst querying certain DOH mark-ups on the requested material), the Commissioner again stated that she remained unpersuaded that the public interest lay in maintaining the exemption. There is no basis for relying on the exemption for entries relating to meetings with the Secretary of State and where the fact of the meeting has already been made public knowledge by DOH. In no case are 'policy options' or further details disclosed.

#### **APPELLANT'S REPLY:**

[18] DOH accepted that it held the information for the purposes of FOIA, and agreed with the Commissioner's ruling that the circumstances outlined in Para. [9], above require entries to be redacted. It also accepted that entries relating to engagements that have already been made public should be disclosed. It clarified certain claims made about the applicability of s40 (2) to particular entries. DOH reiterated the claims made in the Grounds of Appeal, to the effect that the Commissioner failed to give proper regard to the public interest in maintaining the s35 exemption.

#### **WITNESS STATEMENT – SIR CHRIS WORMALD:**

[19] The Permanent Secretary to DOH provided a statement to the Tribunal to detail the operation of the Ministerial office, the role of the diary, and the DOH's approach to transparency, the importance of the 'safe space' and the likely consequences of disclosure of the diary. Sir Chris Wormald also attended the oral hearing and gave helpful evidence to the Tribunal.

#### ***Operation of the Ministerial Office***

[20] Sir Chris Wormald explained that the Ministerial private office played a support role for the Minister by providing briefings and policy advice, recording minutes and actions from meetings and managing the diary. Given the pressures on a Ministerial office, the diary requires flexibility "without having to exert undue concern about the consequences" of last-minute adjustment or reorganisation. Each Ministerial office within the DOH has 1-2 full-time members of staff dedicated to diary management, and



they work separately to the private secretaries who actually attend and minute those meetings. Sir Chris raised concerns that the diary entries will *not* “necessarily constitute an accurate historical record” as the private secretaries have a “much greater understanding of how meetings relate to the intricacies of Government policy than those organising the diary”.

### **Transparency**

[21] Sir Chris Wormald claimed that the current government publishes more information than any previous government. Ministers are held accountable in numerous ways, for example through the duty to Parliament to account for the policies, decisions and actions of their Departments. He cited the commitment to transparency in both the Civil Service and Ministerial Codes, with the requirement that any refusal to publish information be on the basis of the public interest test. He cited 140 transparency-related publications across the government website, 6,539 Parliamentary Questions answered in 2016-17, and over 37,000 items of correspondence. All Departments publish quarterly information on Ministers’ overseas travel, flights, hospitality, and meetings with external organisations and senior media figures. This ‘transparency return’ takes (estimated anecdotally) around six hours to collate, the preparation of a Ministerial Diary would be “more labour intensive” as the redactions would have to be approved by senior staff.

### **Safe Space**

[22] Sir Chris Wormald further explained the need for a safe space extends past the stage of policy formulation, as disclosure even shortly after exerts great pressure on Ministers and produces the ‘chilling effect’. The diary does not exhaustively record every moment of the Minister’s day, and is not prepared with a view to enable the public to access the Minister’s daily schedule and hold him accountable for it. Protecting the safe space around the allocation of a Minister’s time is vital, he explained, to “maintain stakeholder relationships” and prevent misunderstandings of the relative importance of stakeholders when set against time with the Minister.

[23] Sir Chris Wormald further expressed concerns that should diary information be released routinely, Departmental resources would be diverted from managing crises to managing contemporaneous and potential future media responses to criticism of the Minister’s time management. Releasing the diary would unduly expose the Minister’s movements and increase the security risk at a time of significant concern.

## ***Consequences of Disclosure***

[24] Disclosure in the information's present state, he explained, would risk presenting an incomplete and misleading impression of work undertaken by the Minister and his office, and impact on the 'safe space' elaborated previously. It would put pressure on the Department to contextualise departmental business and is a distraction from more pressing matters. It would encourage inappropriate comparisons between Ministers, and inhibit the most efficient organisation of the diary to favour considerations of the best presentation of their time management.

[25] The material would require adjustment. A general rider to accompany the material is unlikely to achieve the desired effect, given the likely response of media outlets to a general statement. It would also mean that in future more proactive information management would be required to allow for contemporaneous recording rather than *ex post facto* explanations. Given that the diary has between 200-300 entries per month, this is an impractical and inefficient use of time and money. Sir Chris Wormald also grouped entries into broad categories and explained how disclosure without explanation or context would give an incomplete or misleading picture of Ministerial time management whilst exposing the Minister to undue criticism and risk. He was of the opinion that the only category of diary entries that should be released are those that detail the Minister's regular and routine engagements.

## **APPELLANT'S SKELETON ARGUMENT FOR HEARING:**

[26] DOH stated that the appeal "raises fundamental questions about the scope and application of s35 (1)", stating that as a "*class*'-based exemption, the operation s 35 is not contingent on there being any specific prejudice caused by the disclosure of information". It accepted that with redactions and a "variable, and information-specific approach", some material could be released. As for the rest, DOH grouped the entries into three headings:

- (i) periods of intense policy formulation engaging s.35(1)(a)
- (ii) Ministerial communications engaging s35(1)(b)
- (iii) management of the Ministerial private office engaging s35(1)d)

[27] DOH went on to cite *All Party Parliamentary Group on Extraordinary Rendition v IC and Foreign and Commonwealth Office* [2013] UKUT 0560 (AAC) ('APPGER'), where the Tribunal emphasised that the correct approach is:

*“ - - to identify the actual harm or prejudice that the proposed disclosure would (or would be likely to or may) cause and the actual benefit its disclosure would (or would be likely to or may) confer or promote. This... requires an appropriately detailed identification...of both - - ”*

It also cited *Amin v IC and Department of Energy and Climate Change* [2015] UKUT 0527 (AAC) to support the proposition that the exemption should be maintained on “anything which would or might result in the policy being formulated less efficiently or less well”.

[28] DOH discussed judicial commentary at the various stages of *Lewis*, citing Charles J at the Upper Tribunal hearing when he ruled that “*a contents based assertion of the public interest...has to show that the actual information is an example of the type of information within the class description of an exemption...and why the manner in which disclosure of its contents will cause or give to a risk of actual harm*”. The Court of Appeal in *Lewis* upheld this decision, approving the requirement for the requester to identify specific “types of benefit from disclosure”.

[29] It was contended that the Commissioner gave no or insufficient weight to the importance of the safe space. The Tribunal in *Lewis* concluded that disclosure of diary entries would have “generally no impact” on this safe space given their brevity and the generalised identification of broad policy topics that would be well known to the public. However, DOH highlighted Sir Chris Wormald’s witness statement explaining that the public presentational pressure occasioned by disclosure can harm the frankness of debate, affecting the dynamic of relationships between the Minister and stakeholders and restricting the ability of the office to respond flexibly to fast-developing situations. Emphasis was also placed on the distraction of time and resources that preparing this material for disclosure would occasion.

[30] DOH disputed that release of the information would contribute to public understanding of Ministerial functions, given the limited information contained in the entries and the substantial amounts of information already in the public domain. DOH disputed that it needed to demonstrate actual harm occasioned, claiming that it would require a higher standard of evidence to prove the exemption than the countervailing

interest in disclosure would require. It asserted that the specific harm or risk of harm identified on a category basis elucidated above would be sufficient.

### **COMMISSIONER'S SKELETON ARGUMENT:**

[31] The Commissioner noted that s1(1)(b) is only dis-applied if the interest in maintaining the exemption outweighs the interest in disclosure, and where the interests are equal then the information must be disclosed: *Lewis* at Court of Appeal. There is no inherent weight in any of the exemptions, so their engagement alone without a concurrent public interest in non-disclosure is not sufficient to justify non-disclosure. *APPGER* did not rule that the Tribunal must be certain that consequences will eventuate, nor that the Tribunal need defer to the views of government.

#### ***Safe Space***

[32] The Commissioner further cited Charles J in the Upper Tribunal decision in *Lewis*, to support the contention that the need for a safe space was overstated as “*any properly informed person will know that information held by a public authority is at risk of disclosure in the public interest*”. There is also a public interest in observing that robust exchanges are taking place and relied upon as important for good decision-making. In order to avail of this, the authority must show why persons whose view and participation in discussions would be discouraged from expressing them. DOH appears to be stating that this discouragement would affect stakeholder relations by exposing the Minister's priorities.

[33] This was not an argument that found favour with the Commissioner, as diary entries do not reveal detailed contents of meetings and the Commissioner cannot see how stakeholder interests would be affected by public knowledge of those priorities that the stakeholders themselves are particularly well placed to know. Furthermore, the Minister's priorities at any given time are evidently of significant public interest. The Commissioner found it instructive to recall the Nolan principles of ‘Selflessness’, ‘Objectivity’, ‘Openness’ and ‘Leadership’ by which Ministers are required to abide.

#### ***Distraction and Burden***

[34] While much had been made of the distraction of time and resources that would be occasioned by this disclosure and the necessary contextualisation, the Commissioner noted that there was hitherto been no reliance placed on s14 FOIA regarding the burden of compliance. The level of contextualisation needed had been overstated, as

the entries relate to matters that would be obvious to anyone with a basic knowledge of Ministerial responsibilities or with a professional diary. It is normal for information released under FOIA to be an incomplete picture, and that does not denude it of value.

***Public interest in disclosure***

[35] The Commissioner disputed the application of s35 (1) to certain classes of diary entries, namely Cabinet-related meetings, responsive (i.e. non-routine) meetings, box entries and preparation time, and some meetings with external third parties. Sir Chris Wormald appreciated that there was a public interest in disclosing the specific information he wished to remain exempt, but the Commissioner considered that he underestimated the weight of that interest. The transparency returns mentioned in the witness statement contain details of meetings with external third parties, and the Commissioner was unclear as to whether DOH's position was that they confirmed all such meetings contained in the diary should be disclosed or only those mentioned in transparency returns.

[36] The Commissioner also took issue with Sir Chris Wormald in the assertion that there is a convention or assumption that dates and times of Cabinet meetings are confidential; rather, the contents and related documentation of such meetings are confidential, not their timing and further, the government's approach to transparency does not permit it to cut across FOIA and determine what information can and cannot be placed into the public domain.

[37] Considering the public interest, the Commissioner accepted that it will vary with the actual content of the disputed information but, quoting *Evans v ICO* [2012] UKUT 313, *"the strength of these general interests should be acknowledged rather than minimised... When disputed information concerns important aspects of the working of government, the interests in accountability and transparency will be not merely of general importance but of particular strength"*. Disclosure in this instance would enhance the accountability and transparency of Government by assisting citizens to understand the nature of the Minister's work, engagements and priorities.

**Closing Submissions from the Appellant:**

[38] DOH identified the core area of dispute as being the s35 redactions. Whilst acknowledging that the Tribunal was not bound by the Commissioner's decision, DOH noted that that decision predated what it described as the "detailed granularity analysis" in Sir Chris Wormald's evidence. The same approach, (it was claimed) was not taken by

the Commissioner, and a blanket approach is wrong both in principle and in law following the decision in *Lewis*.

**[39]** While Sir Chris Wormald accepted that there were points of principle in favour of disclosure, it was also submitted that the true benefit in properly advancing public understanding was “very small/minimal”. This was contrasted with the concerns raised about the negative consequences of disclosure as “minimal [public interest] benefit and maximum distraction”. The public interest is already well met by the more effect transparency mechanisms of the National Audit Office, the Public Accounts Committee, quarterly transparency returns and Parliamentary questions. The diary would give a partial and potentially misleading picture, and attempts to explain or contextualise the entries would be difficult, time consuming and possibly of limited success.

**[40]** The damage to the public interest was crystallised by DOH as follows:

- i) It is damaging to the public interest to turn a process that allows Ministers to best organise their time into an area subject to minute scrutiny and speculation;
- ii) Disclosure is an unnecessary distraction for both Ministers and officials, which is particularly destructive in times of crisis;
- iii) It would negatively affect the dynamic of stakeholder relationships.

**Closing Submissions from the Respondent:**

**[41]** In regards to Sir Chris Wormald’s evidence, the Commissioner commenced by noting that Sir Chris Wormald caveated his own evidence with the assertion that he was not at the Department at the time of the events covered by the diary, with little or no direct knowledge of the events recorded nor the movements of the Minister in question. His own ‘granularity’ assessment was done at a category level and, contrary to the DOH’s submission, the Commissioner was of the opinion that individual entries needed to be assessed for the propriety of disclosure.

**[42]** When asked about the ‘safe space’, Sir Chris Wormald confirmed that this was not advanced as an argument in relation to the *content* of the entries, but rather the *procedures* of the Department in causing distractions and introducing inappropriate considerations into decisions pertaining to time management. Notably, the assertions of any physical risk to the Minister were not relied upon in relation to the contents of the diary, but were explained as ‘context’.

**[43]** The Commissioner considered the impact on discretion as to time management to have been overstated. It was accepted that each Minister worked in a different way, and

that both they and officials are used to taking controversial decisions in the public eye. Sir Chris Wormald conceded that 'window-dressing' of diaries would not be expected in relation to these releases, as he expected Ministers to act properly. Any suggestion that there would be a distraction by a temptation to act improperly is minor, but if it does exist it actually tends towards a public interest to disclose the information in order to properly scrutinise Ministerial behaviour.

**[44]** This scrutiny is facilitated in regards to meetings with external parties by the agreed release of information. The Commissioner saw no justification for greater protection to be extended to internal stakeholders, when there may be a significant and legitimate public and media interest in certain entries outlining particular contact between individuals at specific times. Nor did the Commissioner accept as likely the implication that stakeholders measure the extent and degree with of their influence by 'totting up' the number of minutes spent with the Minister.

**[45]** The diary is a tool used by the Minister to keep up with his appointments; any suggestion of its accuracy being limited is overstated, in the view of the Commissioner. Sir Chris Wormald accepted that it would be a "nearly perfect" record of any **planned** appointments, and in turn the Commissioner accepted that the diary would not completely accord with the Minister's **actual** actions, nor would it cover *ad hoc* situations such as telephone calls. However, it does give an impression of how the Minister spent his time, and a 'general rider' should accompany the diary to explain its limitations. The argument against releasing the rest of the information based on the fact that it would only be a partial record is somewhat diminished by the agreed releases, which, if left at that, would only provide a partial record. Furthermore, a particular entry involving a meeting with a person said by Counsel for the first Respondent to have links to commercial organisations providing services to the NHS was discussed in the closed session that led to queries being raised about its exclusion from the quarterly transparency return. While the Commissioner accepted that the reasons for this exclusion could be innocent or nefarious, the release of the information in the diary would allow this public scrutiny to determine the true explanation.

**[46]** The additional pressure on resources identified by Sir Chris is not relevant, in the view of the Commissioner, as the DOH has not relied upon either of the specific exemptions under ss12 or 14 FOIA.

## **CONCLUSIONS:**

[47] On consideration of all the evidence and submissions before this Tribunal, it is apparent that there is much in common between the parties as to the legal framework and even its application to the disputed information. There has been much confusion, throughout the history of the request leading to this appeal hearing, as to what exemptions the Appellant wished to rely upon. Even when the Appellant finally identified and established those exemptions (often with the assistance of the Respondent), the Appellant has struggled to identify precisely the public interest factors engaged and the weight to be given in favour of maintaining the exemption in each particular case with reasons rather than on general principles. Despite his genuine concern, and his extensive experience working in government, Sir Chris Wormald provided us with little by way of tangible evidence of the harm he opined would result from Disclosure of the particular diary entries before us. We recognise his relevant experience and expertise in Government and civil service affairs and we found him to be a careful and thoughtful witness of significant credibility. We heard his concern about Ministers' distraction and the encroachment of safe space etc. but there is nothing new in this concern and specifically there is no reason why some items in a Minister's diary should or would lead to harm of the nature and extent to which he refers. Ministers are robust individuals otherwise they would not be in office. We found his evidence helpful in so far as it assisted us in concluding that the Commissioner had been right in her analysis of the public interest test. Effectively we are persuaded that the Commissioner was correct in the reasoning in the DN and in her submissions to this Tribunal mostly supported by the determinations in the Lewis case. "The Gist" note of the closed session at the oral hearing of this appeal provides an example of Sir Chris Wormald's sincere and genuine concerns of a general nature, as distinct from demonstrating harm justifying his concern about the release of the specific items within the disputed information under scrutiny. By way of an illustrative, but not exclusive example within the Gist note, he accepted that the Tribunal had to make its decision on the basis of the information contained in the diary. Whilst recognising the decision was to be taken on the specific items under consideration by the Tribunal, he opined it was relevant to take into account not only the implications of the particular release of information but the potential consequences for good governance more generally if diaries were released. It was the perceived consequences and purported harm referred to by Sir Chris Wormald that the Tribunal have not been persuaded to be established as a given result of disclosure of the disputed information that we have now scrutinised closely in this appeal, item by item. We have not been persuaded by his evidence or otherwise, that the release of the



mostly sketchy information being addressed for disclosure on the balance of interest test will cause harm of the nature or extent envisaged by the DOH.

[48] While this Tribunal accept and adopt the reasoning of the Respondent Commissioner in the DN, matters have moved on considerably since that decision was made. We accept that there is now much common ground between the parties and more exemptions engaged than originally sought or anticipated by the Appellant. We recognise that our ability to assist in the resolution of outstanding issues lies, as the parties confirmed and indeed asserted, in our duty to look afresh at each item in the disputed information and apply the appropriate exemptions and our own public interest balance in each particular entry of the diary which is the subject of the disputed information before us. This clearly will substitute the DN in a significant way although it does not necessarily fault the Commissioner's reasoning at the time of the DN.

[49] We therefore undertook a lengthy and detailed study of each entry in turn. Pausing here we note the obvious point made by the Commissioner throughout, that the entries are information mostly about past events, including meetings, that in the main do not touch on the subject matter or detail of what was discussed, done or achieved as a result of the information recorded. For ease of reference, we have identified a number of **Categories of Information**, into which we put each entry, as follows;

A) **Out of scope.**

B) **Information already disclosed.**

C) **Travel.**

D) **Personal.**

E) **Constituency and political.**

F) **Ministerial.**

G) **Matters touching on national security (s.24)**

H) **Matters concerning personal casework, staff appointments, etc.**

[50] Given the clear common ground between the parties, two of these categories require no further consideration:

**A) Out of Scope.**

This includes lines relating to the use of a room by persons other than the Secretary of State, and information about who was Duty Minister during a recess (other than the Secretary of State).

**B) Information already disclosed.**

Some information was disclosed prior to the Tribunal hearing, including lines containing the date only, lines recording only that the day is a public holiday or the date of some other public event, dates of Cabinet meetings, and some (but not all) entries for which the exemption at s.35 (1)(d) had been claimed at an earlier stage.

[51] Entries in the remaining categories need to be considered individually, to determine if a claimed exemption is engaged and, if so, where the balance of public interest lies. It is possible, indeed likely, that similar entries will fall to be dealt with in a similar way, but this should not be taken as an indication that the Tribunal has not given individual consideration to each entry. The information considered by the Tribunal comprised 2,794 individual diary entries ('lines').

**Our General approach:**

[52] The Tribunal was provided with a (closed) version of the diary marked up with exemptions and explanations, claiming that some entries were 'not held' as they were 'personal', 'constituency' or 'political'. This approach is in our view incorrect. In the Lewis case, also concerning Department of Health Ministerial diaries the FTT, and subsequently the UT and the Court of Appeal, all held that such information was held for the purposes of FOIA. (See, in particular, paragraph 56 of the Court of Appeal judgment in which it was said *'for the purposes of section 3 of FOIA the entries in the diary were held by the Department for itself even if they were also held (in the case of personal or constituency matters) for Mr Lansley as well'*.) As such, in the current case, the approach of the Tribunal is to consider whether any exemption applies to the

information in each diary entry and, if so and (if it is not an absolute exemption), where the balance of public interest lies.

**[53]** For a large number of entries relating to Ministerial engagements, the Department claimed s.35 (1), (a), (b) or (d). The Department claiming these exemptions apparently indiscriminately did therefore not assist the Tribunal. For example, prior to the release of certain diary entries to the requester on 20 October 2017, a diary entry for 7<sup>th</sup> May 2015 records that a General Election was taking place that day, yet the entry was described as ‘policy meetings’ to which s.35 (1) (a), (b) or (d) applied. There were numerous other examples of public events, which on the information before us were clearly not ‘policy meetings’ despite initially being described as such. All entries relating to such events were included in the information released on 20 October 2017.

**[54]** It was argued, for the Department, that release of the diary information would intrude on a ‘safe space’ for policy formulation. This argument was, to an extent, devalued by the indiscriminate claiming of the s.35 (1) exemptions. Nevertheless, a major issue for the Tribunal is the application of s.35 (1)(b) (Ministerial communications), and specifically the application of the exemption not to the substance of a Ministerial communication, but to the fact of such a communication having occurred. While the Tribunal accepts that the fact of a communication having been made (for example, through the holding of a meeting or a telephone conversation) is capable of engaging s.35 (1)(b), in most such cases, when considering the public interest case for maintaining the exemption, the mere fact of a communication having occurred cannot weigh as heavily as would the substantive content of such a communication.

**[55]** In his evidence, Sir Chris Wormald spoke of the adverse consequences of disclosure of diary information, as he saw them. Mr Eadie QC summed these up in his closing submissions as being the ability of Ministers to concentrate on the issues ‘*without distraction as to how the press or the public might perceive the precise mechanics of decision making*’.

**[56]** The ‘distraction’ argument was addressed by the Upper Tribunal in Savic 2017 UKUT AACR 26. The circumstances of Savic differ from the instant case as they concerned a single instance of a process, rather than a series of processes of

communication set out in a diary. It concerned the policy 'Neither to Confirm Nor Deny' (NCND) rather than a request of the nature of that in the instant case. On the facts of Savic it was about the level of Government at which an important decision (concerning military action) was taken, and the UT found there was a strong public interest in this being known to the public. In the view of the UT the force of the public interest founded on the distraction argument weakened with the passage of time.

**[57]** In the view of the Tribunal the 'distraction' argument is over-stated in this case. Our experience from evidence in this Tribunal and similar cases has demonstrated to us that Ministers are robust individuals who are unlikely to be distracted in this way. Further, to the extent that the interests of journalists represent the distraction, with 24 hour rolling coverage on broadcast media and websites, it is likely that they will always find something in the responsibilities of a Department to pursue, regardless of whether a release of relatively anodyne diary details has been made. Further we consider that the diary discloses that the Secretary of State spends a considerable amount of time speaking to journalists anyway, presumably largely on his own initiative, or by accepting invitations he could have declined if he wished. We are of the view that this weakens the argument that dealing with the press is a distraction. We also take the view that the release of information in this case comes some time after the event. Even if a request is for diary details up to the current date, by the time the request has been processed within the 20 day period provided, what would be released would be information about largely routine meetings that took place some three to four weeks previously. We also consider that management of media relations and the presentation of policies is now an integral part of the overall management of Government business, thus the additional burden of dealing with queries arising from the release of the requested diary information is likely to be marginal.

**[58]** Sir Chris Wormald argued that release of diary entries could create a misleading picture of Ministerial activity and priorities, as the number and frequency of meetings held is not necessarily a complete picture. Sir Chris felt that the provision of contextual information would not fully address this concern, as it would not work '*in the real world*'. With respect, the Tribunal does not accept this, and endorses, and is bound by what was said by the Tribunal in Lewis, namely: '*It is not a difficult task to publish a short explanation which makes it clear that a Ministerial diary does not give a complete picture of how a Minister spends his time, or of communications between Ministers or*

*between a Minister and his senior officials, or of the relative degree of focus on any particular policy area*. This Tribunal say further - ; nor does a diary give a picture of the weight a Minister might attach to the views of those he meets.

[59] In the course of his oral evidence Sir Chris Wormald said that it was “*not disputed that you can find points of public interest in disclosure in all these things*”. He explained that he considered that this public interest was; “*outweighed by the encroachment on the safe space and the disruption to the public business that (disclosure) would cause*”. For the reasons given above, the Tribunal attaches little weight to the “safe space” and “disruption” arguments presented on the facts or the evidence before us on this appeal.

[60] The Tribunal wish to address another argument, advanced by Sir Chris Wormald in this appeal in support of maintaining the exemption. He said; “*the diary entry we would be releasing, shorn of its wider context and considerably more explanation, doesn't add very much, in my view, to the public interest in this case.*” That is an opinion to which he is entitled, and it may be a factor in determining the weight to be attached to the public interest in disclosure. However, in the context of a statutory entitlement to information, subject to qualified exemptions and the balance of the public interest test, it is not of itself a factor that weighs against disclosure. If the public interest in favour of disclosure is low, but the public interest in favour of maintaining the exemption is equally low, then disclosure must result.

Mr Eadie QC made a similar argument in his written closing submissions, when he said the Commissioner had not addressed his point that there was little value in the information. It seems to us that the Commissioner does not need to address that point as it is not the absolute value of the information to the public that matters in each instance, but the value of maintaining the exemption.

### **Balance of Public Interests:**

#### **Background**

[61] The diary entries disclose that the time of the Secretary of State is spent in a manner that would be expected by anyone with even a passing knowledge of Government affairs. He meets regularly with his junior Ministers, officials, Special

Advisers (SpAds), heads of Agencies for which he is responsible, professional and representative bodies in the field of health, and other stakeholders. He spends time on his 'box' of papers requiring decisions, and on preparing for speeches, Parliamentary questions, press and broadcasting interviews and programmes, and meetings. He attends meetings of Cabinet and its committees, the House of Commons and various meetings of a political nature. He meets regularly with the Prime Minister, and also with Ministerial colleagues in other departments. He undertakes the constituency activities expected of MPs generally, including holding advice surgeries, meeting with constituency officers, conducting visits in the constituency, handling constituency correspondence and canvassing in elections.

### **C) Travel.**

**[62]** This comprises lines detailing the arrangements made for the Secretary of State to travel to engagements, including Ministerial, constituency and personal engagements. The Tribunal agrees with the Commissioner that s.40 (2) is engaged with respect to these entries. Disclosure of them could enable a pattern of travelling arrangements to be established. There is little or no public interest in disclosure, save perhaps to confirm that the Secretary of State makes extensive use of public transport. This is significantly outweighed by the public interest in not compromising the security of a senior Cabinet Minister by disclosing information, which could reveal patterns of regular travel.

### **D) Personal.**

**[63]** This includes time spent with family and friends. The Tribunal agrees that s.40 (2) is engaged. There is no public interest in disclosure of time spent with family and friends, and on personal domestic business. There is significant public interest in the Secretary of State having a private life free from intrusion to allow a 'work-life' balance that enables him to 're-charge his batteries' and thus undertake his ministerial responsibilities more effectively. The Tribunal considered whether, in respect of entries in this category, it would be sufficient to redact the names of those met but to release other details. The Tribunal concluded that, in many cases, this would leave sufficient information to allow an individual to be identified. In particular, a reference to an activity such as 'helping with homework' could apply only to a child of the family. Likewise, an entry that gave details of a school attended by a child whose name had been redacted,

could nevertheless compromise the security of any children of a senior Cabinet Minister. The balance of public interest, we find, requires that all entries in this category should be withheld in their entirety.

### **E) Constituency and political.**

**[64]** Constituency activities are independent of any Ministerial role. To the extent that the information is held in a private office diary, to enable the office to know of the whereabouts of the Minister, so that he may be contacted if need be, the exemption at s.35 (1)(d) is engaged, albeit tangentially.

Many constituency engagements are of a public nature, e.g. public meetings, canvassing during an election, visits to organisations within the constituency (some of which may well have been regarded as 'photo opportunities' for the local press). MPs generally routinely seek publicity for many of their constituency activities. The public nature of most of the engagements is such that the public interest in maintaining the exemption is low, and is outweighed by the public interest in knowing the extent to which the Minister takes a particular interest in constituency matters that touch upon his Ministerial responsibilities.

s.40(2) is engaged in relation to named individuals, other than the MP, many of whom are volunteers within the local political party. The public interest in protecting the reasonable expectations of privacy of those individuals outweighs significantly any public interest in disclosure of their identities. When information is disclosed, names of organisers and other volunteers, and email or other contact details of such persons, should be redacted pursuant to s.40 (2).

The fact that a constituency surgery has been held is a matter of public record, as it is in the nature of such events that the availability of the MP is publicised. Such diary entries give no details of individuals attending the surgery. However, where a diary entry relates to an individual meeting with a constituent on a casework matter, other than in a surgery, the name and all personal details of the constituent should be redacted, pursuant to s.40 (2). In practice, this is likely to require the redaction of the diary entry in its entirety.

Some out of constituency political meetings, including party conference, and speeches at the constituency dinners of other MPs, are also included in this category.

In summary, s.35 (1)(d) is engaged in respect of constituency and other political activities, but only marginally so. The balance of public interest favours disclosure, subject to redactions pursuant to s.40 (2).

### **F) Ministerial.**

**[65]** This comprises the largest single group of diary entries. In respect of most of these, s.35 (1) (a), (b) or (d) may be engaged. The balance of public interest must be considered in relation to each entry.

#### **INTERESTS SERVED BY DISCLOSURE**

- General value of transparency and openness in public administration – positive.
- Accountability: whether the Minister provided good value and was properly carrying out his functions – positive.
- Transparency relating to Ministerial meetings with external organisations, the media, lobbying, access to Ministers and relations with particular interest groups – high.
- Facilitating informed public debate on Departmental policies – minimal.
- Public understanding of how Government works – significant.
- Public understanding of how the Minister spent his time, and the subject matters within his portfolio to which he gave personal attention – high.
- Public understanding of the relative priorities of the Minister over the period of time in question – positive.
- Public understanding of any private interests the Minister might have, which might impact on decision making – negligible.

#### **INTERESTS SERVED BY MAINTAINING EXEMPTION**

- Potentially misleading information would need to be explained – modest additional burden likely.



- Distraction – Unlikely to occur to any significant extent.
- Risk of Ministers adjusting their appointment schedules so as to create a favourable impression – highly unlikely to occur.
- Impeding policy formulation – unlikely that disclosure of information that a meeting had taken place, without disclosure of its substance, would intrude on any safe space for policy formulation.
- Resource impact on private office – likely to occur if further requests made.

**[66]** The Tribunal finds, having largely rejected the ‘distraction’ argument, that the balance of public interest generally favours disclosure. However, the Tribunal acknowledges that there may be cases in which the mere fact of a meeting having taken place may, if its nature was revealed, intrude on the formulation or development of government policy. In such cases, depending on the individual facts, the balance of public interest may favour maintenance of the exemption, under s.35 (1)(a) and/or (b). In the instant case, the Tribunal found no such diary entries. (But see below with respect to national security issues which engage s.24.).

**[67]** A further case in which the mere fact of a meeting having taken place should not be disclosed is where the meeting was concerned with handling a personal casework matter or the making of a staff appointment, thus engaging s.40 (2). The Tribunal found a small number of such cases in the disputed information. In these cases the redaction of a name alone would not suffice, as the subject matter and the details of others attending could enable an individual to be identified. Examples include meeting an MP about a personal case concerning a constituent, pay reviews of staff in a category with so few in it that individuals could readily be identified, and preliminary consideration of the re-appointment or otherwise of the holder of a public office. In such cases the Tribunal considers that the reasonable expectation of privacy on the part of the individuals concerned outweighs any minimal public interest in disclosure on the grounds of transparency. Casework matters engaging the attention of the Secretary of State for Health are likely also to involve ‘sensitive personal data’ within the meaning of s.2 (e) Data Protection Act 1998.

**[68]** The Tribunal gave particular consideration to two matters advanced on behalf of the DOH. First, it was claimed that meetings and other communications between the

Secretary of State and the Prime Minister attracted a particular sensitivity, but no reason was given for this, by reference to individual diary entries. Some of the entries appeared to be fortnightly meetings between the Prime Minister and the Secretary of State, but the Tribunal was informed subsequently by the Appellant that the entries were time set aside for the Secretary of State to write to the Prime Minister. The Prime Minister is, by convention, *primus inter pares* in respect of Cabinet colleagues but, in reality, as he/she is the person who can appoint and remove them, the Prime Minister also has a line management role in relation to them. A pattern of routine communications and meetings on specific issues would be expected in any such relationship. As the subject (sometimes) and the substance (always) of such meetings or communications is not disclosed in the diary, the Tribunal's starting point is that, in common with other routine Ministerial meetings shown in the diary, the balance of public interest lies in favour of disclosure. The entries referring to the Prime Minister contained within the disputed information did not disclose individual facts or considerations that would tip the balance the other way. Nevertheless, the Tribunal recognises that a different balance could result in some cases of meetings involving the Prime Minister, dependent on the facts in each case. There appears to the Tribunal to be a significant public interest in understanding how the relationship between the Prime Minister and his/her Cabinet colleagues operates in practice. In relation to the specific entries in the disputed information concerning meetings or communications with the Prime Minister, the Tribunal concludes that the balance of public interest requires disclosure.

**[69]** The Tribunal considered the claim that the fact of a Cabinet or Cabinet Committee meetings having taken place should be withheld. With respect to Cabinet it is usually public knowledge that meetings have occurred, if only because Cabinet Members walk the gauntlet of press photographers in Downing Street on their way to meetings. Whilst the proceedings of Cabinet are never commented upon, the fact that a meeting has occurred is not denied. The public nature of the fact that a meeting has occurred means there is no case for maintaining the exemption in respect of that mere fact. Cabinet meetings were among the diary entries eventually disclosed on 20 October 2017.

**[70]** Cabinet committees, on the evidence of Sir Chris Wormald, do not meet on a fixed schedule, dealing with much business by correspondence and holding a physical meeting only when required. This could make disclosure of the fact of a meeting having occurred more significant, and the balance of public interest needs to be weighed in

relation to individual meetings. In general, Government appears not to take a NCND approach to Cabinet Committee meetings, but to simply decline to comment on matters that were considered. In the majority of cases of Cabinet Committee meetings the balance of public interest favours disclosure of the fact that the meeting had occurred, on the same basis as other Ministerial meetings. In a minority of cases the Tribunal considers s.24 to be engaged in respect of such meetings; these are addressed below.

**[71]** The Department claimed that the fact that *ad hoc* Ministerial meetings, which attract the 'COBRA' designation, had been held should not be disclosed. The fact that such meetings have been held, in response to emergency situations, is commonly widely reported in the press. The Tribunal can see no justification for such blanket non-disclosure; each case must be considered on its own facts and merits. In the case of 'COBRA' designated meetings within the disputed information the Tribunal found no factors that would warrant withholding the fact that the meeting had occurred.

**[72]** The Tribunal was not helped by the fact that in respect of a number of diary entries, the entry was described as 'not held – political'. As stated above, the Tribunal, following the authority of the Lewis case, which also concerned Department of Health Ministerial diaries, does not accept that such entries are 'not held'. As with constituency political engagements, whilst s.35 (1)(d) is engaged, it is engaged only tangentially. Many engagements described as 'political' are clearly a part of the role of the Secretary of State. These include such things as speeches made at or in conjunction with a party conference, in which the Secretary of State is billed by that title. Similarly, meetings with journalists at party conferences are clearly sought because of the office held. The Department made no case for a public interest in maintaining the exemption, perhaps because of a mistaken belief that the information was 'not held'. In these cases the Tribunal considers there is a public interest in understanding how a Government Minister operates in the environment of a party conference at which he is advancing and defending the policies of the Government of which he is a member, and particularly in relation to policies for which he has lead responsibility. As such, these diary entries should be disclosed.

**[73]** Finally, most diary entries name a person or persons met. The Tribunal has considered the extent to which names should be redacted pursuant to s.40 (2). In many cases the aspect of the information that generates the public interest in disclosure lies

in the subject of the meeting, which is, in most cases, an area of NHS policy. For example, entries 998, 999, 1,000 and 1002 are about General Practice and Social Care, Care, Diabetes and Dementia respectively. In other cases the information that generates the public interest in disclosure is the identity of the person(s) met, for example, representatives of stakeholder groups within the NHS, Members of the House of Commons or House of Lords, heads of health service agencies (including NHS England itself). Some of those attending internal meetings are identified by their first name only.

**[74]** Names which should not be redacted: Members of the Senior Civil Service (Grade 5 and above), persons of equivalent seniority in agencies of the Department of Health (including the NHS), persons holding senior representative positions in stakeholder organisations, journalists, persons in senior positions in commercial organisations with dealings with the NHS, current and former Members of the House of Commons, Members of the House of Lords.

**[75]** Names which should be redacted: Civil servants below the level of the Senior Civil Service (unless in public facing roles), staff of equivalent rank and responsibility in agencies of the Department of Health.

**G) Matters Touching on National Security.**

**[76]** The Tribunal considers that the details of the entries at line 1561 and line 2061 should be withheld, as s.24 is engaged, and the balance of public interest favours maintenance of the exemption. The Tribunal's reasons are given in a short closed judgment.

**[77]** Applying the reasoning above, in the following table a letter is placed against each of the 2,794 numbered diary entries to indicate the Tribunal's decision as to where the balance of public interest lies. The letters indicate, as stated above, the following:

**A) Out of scope.**

**B) Information already disclosed.**

C) **Travel.** - travel information to be withheld pursuant to s.40(2)

D) **Personal.** - personal information to be withheld pursuant to s.40(2)

E) **Constituency and political** - constituency or other political information to be released subject to redaction of names and personal details of constituency workers. (Includes national campaigning during General Election campaign, some Parliamentary party meetings, party conference, and some out of constituency engagements of a purely political nature.)

F) **Ministerial.** - Ministerial information to be released as the balance of public interests, as discussed above, favours disclosure. In all cases any remaining names of junior officials and all personal details such as email addresses to be redacted.

G) **Matters touching on national security (s.24)** - Ministerial information in respect of which the balance of public interests favours maintenance of the exemption under s.24(national security). These entries should be redacted in their entirety.

H) **Matters concerning personal casework, staff appointments, etc.** - Ministerial information relating to meetings involving personal casework or staff appointments in respect of which s.40 (2) is engaged and the balance of public interest favours maintenance of the exemption. These entries should be redacted in their entirety.

### **TRIBUNAL TABLE OF CATEGORIES**

1. B
2. B
3. C
4. C
5. E
6. E
7. D
8. E
9. A

10. **E**  
11. **E**  
12. **E**  
13. **B**  
14. **B**  
15. **F**  
16. **C**  
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18. **B**  
19. **E**  
20. **A**  
21. **A**  
22. **A**  
23. **C**  
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26. **B**  
27. **B**  
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30. **B**  
31. **E**  
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34. **E**  
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36. **F**  
37. **E**  
38. **E**  
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40. **A**  
41. **E**  
42. **A**  
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44. **E**  
45. **E**  
46. **B**  
47. **B**  
48. **C**  
49. **C**  
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51. **E**  
52. **E**  
53. **E**  
54. **E**  
55. **B**

- 56. **E**
- 57. **D**
- 58. **B**
- 59. **A**
- 60. **B**
- 61. **B**
- 62. **B**
- 63. **D**
- 64. **B**
- 65. **E**
- 66. **A**
- 67. **B**
- 68. **F**
- 69. **F**
- 70. **B**
- 71. **A**
- 72. **F**
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- 74. **F**
- 75. **F**
- 76. **F**
- 77. **F**
- 78. **E**
- 79. **E**
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- 82. **B**
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- 84. **F**
- 85. **F**
- 86. **F**
- 87. **F**
- 88. **D**
- 89. **D**
- 90. **F**
- 91. **F**
- 92. **F**
- 93. **D**
- 94. **D**
- 95. **B**
- 96. **D**
- 97. **D**
- 98. **F**
- 99. **F**
- 100. **F**
- 101. **F**

- 102. **D**
- 103. **F**
- 104. **F**
- 105. **B**
- 106. **C**
- 107. **C**
- 108. **C**
- 109. **F**
- 110. **B**
- 111. **B**
- 112. **F**
- 113. **E**
- 114. **F**
- 115. **C**
- 116. **E**
- 117. **C**
- 118. **B**
- 119. **F**
- 120. **E**
- 121. **D**
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- 123. **F**
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- 127. **B**
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- 134. **B**
- 135. **D**
- 136. **B**
- 137. **D**
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- 144. **B**
- 145. **B**
- 146. **F**
- 147. **E**



- 148. **F**
- 149. **F**
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- 164. **C**
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- 166. **B**
- 167. **D**
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- 173. **D**
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- 253. **F**
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- 261. **F**
- 262. **B**
- 263. **F**
- 264. **B**
- 265. **F**
- 266. **F**
- 267. **F**
- 268. **B**
- 269. **F**
- 270. **C**
- 271. **F**
- 272. **B**
- 273. **B**
- 274. **B**
- 275. **F**
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- 282. **C**
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- 291. **B**
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- 293. **F**
- 294. **F**
- 295. **B**
- 296. **E**
- 297. **D**
- 298. **F**
- 299. **B**
- 300. **F**
- 301. **B**
- 302. **C**
- 303. **C**
- 304. **B**
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- 306. **A**
- 307. **C**
- 308. **C**
- 309. **A**
- 310. **C**
- 311. **F**
- 312. **F**
- 313. **F**
- 314. **C**
- 315. **D**
- 316. **B**
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- 321. **C**
- 322. **E**
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- 327. **E**
- 328. **C**
- 329. **D**
- 330. **B**
- 331. **A**

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- 333. **B**
- 334. **A**
- 335. **D**
- 336. **A**
- 337. **D**
- 338. **D**
- 339. **D**
- 340. **B**
- 341. **F**
- 342. **E**
- 343. **B**
- 344. **B**
- 345. **B**
- 346. **B**
- 347. **B**
- 348. **D**
- 349. **B**
- 350. **F**
- 351. **F**
- 352. **F**
- 353. **B**
- 354. **F**
- 355. **D**
- 356. **F**
- 357. **F**
- 358. **B**
- 359. **F**
- 360. **D**
- 361. **B**
- 362. **F**
- 363. **E**
- 364. **F**
- 365. **H**
- 366. **F**
- 367. **F**
- 368. **F**
- 369. **F**
- 370. **F**
- 371. **E**
- 372. **D**
- 373. **D**
- 374. **B**
- 375. **F**
- 376. **B**
- 377. **D**

- 378. **B**
- 379. **F**
- 380. **C**
- 381. **B**
- 382. **F**
- 383. **B**
- 384. **D**
- 385. **F**
- 386. **F**
- 387. **F**
- 388. **F**
- 389. **F**
- 390. **F**
- 391. **F**
- 392. **F**
- 393. **F**
- 394. **B**
- 395. **F**
- 396. **B**
- 397. **E**
- 398. **A**
- 399. **F**
- 400. **F**
- 401. **D**
- 402. **F**
- 403. **A**
- 404. **D**
- 405. **F**
- 406. **D**
- 407. **D**
- 408. **B**
- 409. **D**
- 410. **C**
- 411. **C**
- 412. **B**
- 413. **A**
- 414. **B**
- 415. **C**
- 416. **D**
- 417. **D**
- 418. **B**
- 419. **D**
- 420. **F**
- 421. **D**
- 422. **B**
- 423. **A**

- 424. **E**
- 425. **D**
- 426. **B**
- 427. **F**
- 428. **B**
- 429. **F**
- 430. **B**
- 431. **B**
- 432. **B**
- 433. **F**
- 434. **D**
- 435. **B**
- 436. **B**
- 437. **B**
- 438. **B**
- 439. **D**
- 440. **B**
- 441. **F**
- 442. **B**
- 443. **A**
- 444. **B**
- 445. **F**
- 446. **F**
- 447. **F**
- 448. **F**
- 449. **F**
- 450. **B**
- 451. **D**
- 452. **F**
- 453. **F**
- 454. **E**
- 455. **D**
- 456. **B**
- 457. **F**
- 458. **D**
- 459. **B**
- 460. **F**
- 461. **F**
- 462. **B**
- 463. **E**
- 464. **D**
- 465. **F**
- 466. **D**
- 467. **F**
- 468. **D**
- 469. **B**

- 470. C
- 471. B
- 472. F
- 473. D
- 474. B
- 475. F
- 476. C
- 477. F
- 478. E
- 479. D
- 480. F
- 481. F
- 482. F
- 483. F
- 484. C
- 485. D
- 486. F
- 487. B
- 488. C
- 489. B
- 490. C
- 491. B
- 492. A
- 493. C
- 494. C
- 495. E
- 496. E
- 497. E
- 498. E
- 499. E
- 500. D
- 501. B
- 502. D
- 503. D
- 504. D
- 505. D
- 506. B
- 507. D
- 508. B
- 509. F
- 510. B
- 511. F
- 512. B
- 513. B
- 514. D
- 515. F



516. **B**  
517. **B**  
518. **B**  
519. **B**  
520. **D**  
521. **D**  
522. **D**  
523. **D**  
524. **F**  
525. **B**  
526. **A**  
527. **F**  
528. **D**  
529. **D**  
530. **B**  
531. **F**  
532. **F**  
533. **F**  
534. **F**  
535. **F**  
536. **B**  
537. **F**  
538. **B**  
539. **F**  
540. **B**  
541. **E**  
542. **D**  
543. **B**  
544. **F**  
545. **C**  
546. **B**  
547. **C**  
548. **B**  
549. **B**  
550. **F**  
551. **B**  
552. **D**  
553. **D**  
554. **D**  
555. **B**  
556. **F**  
557. **E**  
558. **F**  
559. **F**  
560. **F**  
561. **F**

562. C  
563. D  
564. B  
565. B  
566. C  
567. C  
568. B  
569. A  
570. B  
571. A  
572. C  
573. A  
574. B  
575. C  
576. D  
577. D  
578. D  
579. D  
580. B  
581. D  
582. D  
583. D  
584. D  
585. B  
586. F  
587. F  
588. B  
589. B  
590. F  
591. B  
592. F  
593. D  
594. F  
595. B  
596. H  
597. B  
598. B  
599. B  
600. D  
601. D  
602. B  
603. F  
604. F  
605. B  
606. F  
607. F

608. **D**  
609. **D**  
610. **F**  
611. **E**  
612. **B**  
613. **B**  
614. **B**  
615. **F**  
616. **E**  
617. **F**  
618. **E**  
619. **B**  
620. **F**  
621. **C**  
622. **C**  
623. **B**  
624. **C**  
625. **C**  
626. **F**  
627. **F**  
628. **F**  
629. **F**  
630. **D**  
631. **F**  
632. **D**  
633. **D**  
634. **D**  
635. **B**  
636. **F**  
637. **B**  
638. **C**  
639. **E**  
640. **D**  
641. **F**  
642. **D**  
643. **F**  
644. **F**  
645. **C**  
646. **C**  
647. **B**  
648. **B**  
649. **F**  
650. **C**  
651. **C**  
652. **E**  
653. **A**

654. E  
655. E  
656. E  
657. E  
658. D  
659. A  
660. F  
661. E  
662. B  
663. D  
664. D  
665. D  
666. B  
667. D  
668. B  
669. F  
670. B  
671. F  
672. B  
673. B  
674. B  
675. F  
676. D  
677. B  
678. B  
679. F  
680. B  
681. F  
682. F  
683. B  
684. F  
685. F  
686. F  
687. B  
688. F  
689. D  
690. F  
691. F  
692. A  
693. F  
694. B  
695. E  
696. D  
697. B  
698. B  
699. D

700. **D**  
701. **D**  
702. **F**  
703. **B**  
704. **F**  
705. **C**  
706. **D**  
707. **C**  
708. **F**  
709. **B**  
710. **B**  
711. **A**  
712. **D**  
713. **A**  
714. **B**  
715. **B**  
716. **D**  
717. **F**  
718. **F**  
719. **F**  
720. **F**  
721. **D**  
722. **B**  
723. **F**  
724. **B**  
725. **E**  
726. **C**  
727. **F**  
728. **F**  
729. **D**  
730. **B**  
731. **F**  
732. **F**  
733. **A**  
734. **C**  
735. **D**  
736. **A**  
737. **D**  
738. **A**  
739. **B**  
740. **D**  
741. **D**  
742. **D**  
743. **E**  
744. **B**  
745. **B**

746. **D**  
747. **E**  
748. **B**  
749. **F**  
750. **B**  
751. **B**  
752. **B**  
753. **B**  
754. **B**  
755. **B**  
756. **B**  
757. **C**  
758. **F**  
759. **F**  
760. **F**  
761. **C**  
762. **F**  
763. **F**  
764. **B**  
765. **E**  
766. **B**  
767. **F**  
768. **D**  
769. **F**  
770. **B**  
771. **F**  
772. **D**  
773. **B**  
774. **B**  
775. **F**  
776. **F**  
777. **F**  
778. **B**  
779. **F**  
780. **F**  
781. **B**  
782. **F**  
783. **D**  
784. **B**  
785. **F**  
786. **D**  
787. **D**  
788. **B**  
789. **F**  
790. **F**  
791. **F**

792. **B**  
793. **F**  
794. **F**  
795. **F**  
796. **F**  
797. **F**  
798. **F**  
799. **F**  
800. **F**  
801. **F**  
802. **F**  
803. **F**  
804. **D**  
805. **B**  
806. **F**  
807. **C**  
808. **B**  
809. **C**  
810. **B**  
811. **B**  
812. **C**  
813. **F**  
814. **B**  
815. **C**  
816. **D**  
817. **D**  
818. **F**  
819. **B**  
820. **D**  
821. **C**  
822. **B**  
823. **C**  
824. **B**  
825. **C**  
826. **D**  
827. **D**  
828. **B**  
829. **F**  
830. **D**  
831. **D**  
832. **B**  
833. **F**  
834. **D**  
835. **B**  
836. **F**  
837. **B**

838. **B**  
839. **B**  
840. **B**  
841. **B**  
842. **D**  
843. **B**  
844. **F**  
845. **B**  
846. **F**  
847. **B**  
848. **F**  
849. **D**  
850. **B**  
851. **F**  
852. **E**  
853. **D**  
854. **F**  
855. **F**  
856. **F**  
857. **F**  
858. **F**  
859. **F**  
860. **F**  
861. **F**  
862. **F**  
863. **F**  
864. **F**  
865. **F**  
866. **E**  
867. **F**  
868. **D**  
869. **B**  
870. **B**  
871. **A**  
872. **C**  
873. **F**  
874. **F**  
875. **C**  
876. **D**  
877. **F**  
878. **D**  
879. **F**  
880. **B**  
881. **B**  
882. **D**  
883. **C**



- 884. **B**
- 885. **C**
- 886. **B**
- 887. **C**
- 888. **B**
- 889. **A**
- 890. **C**
- 891. **D**
- 892. **B**
- 893. **B**
- 894. **B**
- 895. **E**
- 896. **C**
- 897. **C**
- 898. **E**
- 899. **E**
- 900. **E**
- 901. **D**
- 902. **D**
- 903. **E**
- 904. **E**
- 905. **E**
- 906. **E**
- 907. **B**
- 908. **B**
- 909. **E**
- 910. **E**
- 911. **B**
- 912. **B**
- 913. **D**
- 914. **D**
- 915. **D**
- 916. **B**
- 917. **B**
- 918. **D**
- 919. **B**
- 920. **B**
- 921. **B**
- 922. **B**
- 923. **D**
- 924. **B**
- 925. **F**
- 926. **B**
- 927. **C**
- 928. **B**
- 929. **B**

930. D  
931. F  
932. F  
933. F  
934. F  
935. F  
936. D  
937. F  
938. F  
939. F  
940. F  
941. E  
942. D  
943. B  
944. B  
945. D  
946. D  
947. D  
948. A  
949. D  
950. F  
951. F  
952. D  
953. F  
954. F  
955. F  
956. B  
957. B  
958. D  
959. E  
960. C  
961. D  
962. A  
963. D  
964. F  
965. F  
966. D  
967. B  
968. B  
969. D  
970. C  
971. B  
972. C  
973. F  
974. H  
975. F

976. **D**  
977. **B**  
978. **B**  
979. **D**  
980. **D**  
981. **D**  
982. **D**  
983. **D**  
984. **B**  
985. **B**  
986. **D**  
987. **D**  
988. **D**  
989. **B**  
990. **B**  
991. **D**  
992. **B**  
993. **B**  
994. **B**  
995. **B**  
996. **F**  
997. **D**  
998. **F**  
999. **B**  
1000. **B**  
1001. **F**  
1002. **B**  
1003. **B**  
1004. **B**  
1005. **D**  
1006. **D**  
1007. **F**  
1008. **H**  
1009. **F**  
1010. **F**  
1011. **D**  
1012. **F**  
1013. **F**  
1014. **H**  
1015. **F**  
1016. **E**  
1017. **D**  
1018. **B**  
1019. **B**  
1020. **D**  
1021. **B**

1022. **F**  
1023. **F**  
1024. **F**  
1025. **F**  
1026. **D**  
1027. **F**  
1028. **F**  
1029. **F**  
1030. **F**  
1031. **F**  
1032. **D**  
1033. **B**  
1034. **B**  
1035. **D**  
1036. **D**  
1037. **D**  
1038. **D**  
1039. **D**  
1040. **F**  
1041. **D**  
1042. **F**  
1043. **D**  
1044. **B**  
1045. **B**  
1046. **D**  
1047. **D**  
1048. **C**  
1049. **C**  
1050. **E**  
1051. **E**  
1052. **E**  
1053. **E**  
1054. **E**  
1055. **D**  
1056. **B**  
1057. **B**  
1058. **D**  
1059. **D**  
1060. **B**  
1061. **B**  
1062. **D**  
1063. **B**  
1064. **B**  
1065. **D**  
1066. **E**  
1067. **D**

1068. **C**  
1069. **D**  
1070. **D**  
1071. **B**  
1072. **B**  
1073. **D**  
1074. **D**  
1075. **A**  
1076. **D**  
1077. **B**  
1078. **B**  
1079. **D**  
1080. **D**  
1081. **A**  
1082. **A**  
1083. **D**  
1084. **D**  
1085. **B**  
1086. **B**  
1087. **D**  
1088. **D**  
1089. **D**  
1090. **D**  
1091. **A**  
1092. **B**  
1093. **B**  
1094. **D**  
1095. **D**  
1096. **D**  
1097. **D**  
1098. **B**  
1099. **B**  
1100. **D**  
1101. **D**  
1102. **D**  
1103. **D**  
1104. **B**  
1105. **B**  
1106. **D**  
1107. **D**  
1108. **D**  
1109. **B**  
1110. **B**  
1111. **D**  
1112. **D**  
1113. **D**

1114. **D**  
1115. **B**  
1116. **B**  
1117. **D**  
1118. **D**  
1119. **D**  
1120. **B**  
1121. **B**  
1122. **D**  
1123. **D**  
1124. **D**  
1125. **A**  
1126. **D**  
1127. **B**  
1128. **B**  
1129. **D**  
1130. **D**  
1131. **D**  
1132. **D**  
1133. **B**  
1134. **B**  
1135. **D**  
1136. **D**  
1137. **D**  
1138. **D**  
1139. **D**  
1140. **B**  
1141. **B**  
1142. **D**  
1143. **D**  
1144. **D**  
1145. **D**  
1146. **D**  
1147. **B**  
1148. **B**  
1149. **D**  
1150. **D**  
1151. **D**  
1152. **B**  
1153. **BB**  
1154. **D**  
1155. **D**  
1156. **D**  
1157. **B**  
1158. **B**  
1159. **D**

1160. D  
1161. D  
1162. B  
1163. B (Amended under slip rule 40)  
1164. D  
1165. D  
1166. D  
1167. A  
1168. B  
1169. B  
1170. D  
1171. D  
1172. D  
1173. A  
1174. B  
1175. B  
1176. D  
1177. D  
1178. D  
1179. B  
1180. B  
1181. D  
1182. D  
1183. D  
1184. D  
1185. C  
1186. B  
1187. B  
1188. D  
1189. C  
1190. B  
1191. B  
1192. D  
1193. B  
1194. F  
1195. B  
1196. B  
1197. D  
1198. D  
1199. B  
1200. F  
1201. B  
1202. B  
1203. B  
1204. D  
1205. F

1206. **F**  
1207. **B**  
1208. **B**  
1209. **F**  
1210. **E**  
1211. **D**  
1212. **B**  
1213. **B**  
1214. **D**  
1215. **D**  
1216. **D**  
1217. **E**  
1218. **C**  
1219. **C**  
1220. **F**  
1221. **C**  
1222. **B**  
1223. **B**  
1224. **F**  
1225. **D**  
1226. **B**  
1227. **D**  
1228. **B**  
1229. **B**  
1230. **F**  
1231. **F**  
1232. **F**  
1233. **B**  
1234. **B**  
1235. **E**  
1236. **C**  
1237. **E**  
1238. **E**  
1239. **E**  
1240. **E**  
1241. **A**  
1242. **E**  
1243. **D**  
1244. **E**  
1245. **E**  
1246. **C**  
1247. **D**  
1248. **B**  
1249. **B**  
1250. **C**  
1251. **C**



1252. **D**  
1253. **C**  
1254. **C**  
1255. **B**  
1256. **B**  
1257. **D**  
1258. **D**  
1259. **B**  
1260. **D**  
1261. **F**  
1262. **B**  
1263. **F**  
1264. **B**  
1265. **F**  
1266. **B**  
1267. **B**  
1268. **F**  
1269. **F**  
1270. **B**  
1271. **B**  
1272. **F**  
1273. **B**  
1274. **B**  
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1276. **F**  
1277. **B**  
1278. **F**  
1279. **F**  
1280. **D**  
1281. **F**  
1282. **B**  
1283. **B**  
1284. **A**  
1285. **B**  
1286. **F**  
1287. **F**  
1288. **F**  
1289. **F**  
1290. **B**  
1291. **B**  
1292. **F**  
1293. **B**  
1294. **B**  
1295. **F**  
1296. **F**  
1297. **F**

1298. **F**  
1299. **F**  
1300. **B**  
1301. **F**  
1302. **C**  
1303. **F**  
1304. **F**  
1305. **F**  
1306. **B**  
1307. **B**  
1308. **D**  
1309. **D**  
1310. **A**  
1311. **F**  
1312. **C**  
1313. **B**  
1314. **F**  
1315. **A**  
1316. **F**  
1317. **A**  
1318. **F**  
1319. **F**  
1320. **D**  
1321. **B**  
1322. **F**  
1323. **B**  
1324. **D**  
1325. **C**  
1326. **A**  
1327. **F**  
1328. **F**  
1329. **C**  
1330. **F**  
1331. **B**  
1332. **B**  
1333. **E**  
1334. **H**  
1335. **F**  
1336. **F**  
1337. **F**  
1338. **F**  
1339. **B**  
1340. **D**  
1341. **B**  
1342. **D**  
1343. **D**

1344. **D**  
1345. **D**  
1346. **D**  
1347. **B**  
1348. **D**  
1349. **D**  
1350. **D**  
1351. **B**  
1352. **F**  
1353. **B**  
1354. **F**  
1355. **B**  
1356. **B**  
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1964.	<b>B</b>
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1983.	<b>B</b>
1984.	<b>C</b>
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1986.	<b>C</b>
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2258. **B**  
2259. **D**  
2260. **B**  
2261. **F**  
2262. **F**  
2263. **F**

2264. C  
2265. F  
2266. B  
2267. F  
2268. F  
2269. D  
2270. F  
2271. F  
2272. F  
2273. C  
2274. C  
2275. E  
2276. C  
2277. B  
2278. E  
2279. D  
2280. E  
2281. E  
2282. E  
2283. E  
2284. E  
2285. E  
2286. E  
2287. E  
2288. B  
2289. D  
2290. B  
2291. D  
2292. B  
2293. F  
2294. B  
2295. B  
2296. F  
2297. B  
2298. B  
2299. B  
2300. F  
2301. F  
2302. B  
2303. C  
2304. D  
2305. D  
2306. B  
2307. F  
2308. C  
2309. B

2310. F  
2311. F  
2312. F  
2313. F  
2314. F  
2315. F  
2316. F  
2317. F  
2318. F  
2319. B  
2320. F  
2321. F  
2322. C  
2323. D  
2324. D  
2325. D  
2326. E  
2327. B  
2328. F  
2329. C  
2330. C  
2331. B  
2332. C  
2333. D  
2334. B  
2335. F  
2336. F  
2337. F  
2338. B  
2339. F  
2340. C  
2341. D  
2342. D  
2343. F  
2344. B  
2345. D  
2346. D  
2347. F  
2348. F  
2349. D  
2350. B  
2351. E  
2352. C  
2353. B  
2354. C  
2355. C



2356. E  
2357. C  
2358. B  
2359. A  
2360. D  
2361. D  
2362. D  
2363. D  
2364. D  
2365. B  
2366. A  
2367. D  
2368. D  
2369. B  
2370. F  
2371. B  
2372. F  
2373. C  
2374. C  
2375. C  
2376. B  
2377. C  
2378. C  
2379. C  
2380. B  
2381. B  
2382. F  
2383. B  
2384. B  
2385. D  
2386. B  
2387. F  
2388. F  
2389. B  
2390. D  
2391. F  
2392. F  
2393. F  
2394. F  
2395. B  
2396. C  
2397. D  
2398. C  
2399. D  
2400. B  
2401. F

2402. **B**  
2403. **F**  
2404. **C**  
2405. **B**  
2406. **C**  
2407. **F**  
2408. **B**  
2409. **B**  
2410. **D**  
2411. **F**  
2412. **B**  
2413. **F**  
2414. **F**  
2415. **F**  
2416. **E**  
2417. **F**  
2418. **C**  
2419. **D**  
2420. **D**  
2421. **B**  
2422. **B**  
2423. **D**  
2424. **D**  
2425. **C**  
2426. **F**  
2427. **C**  
2428. **D**  
2429. **C**  
2430. **D**  
2431. **B**  
2432. **D**  
2433. **E**  
2434. **E**  
2435. **E**  
2436. **E**  
2437. **E**  
2438. **E**  
2439. **E**  
2440. **E**  
2441. **E**  
2442. **E**  
2443. **E**  
2444. **E**  
2445. **B**  
2446. **D**  
2447. **D**

2448. **D**  
2449. **D**  
2450. **C**  
2451. **D (Amended under slip rule 40)**  
2452. **B (Amended under slip rule 40)**  
2453. **D**  
2454. **D**  
2455. **D**  
2456. **B**  
2457. **F**  
2458. **F**  
2459. **B**  
2460. **F**  
2461. **B**  
2462. **B**  
2463. **B**  
2464. **F**  
2465. **F**  
2466. **D**  
2467. **B**  
2468. **F**  
2469. **B**  
2470. **F**  
2471. **F**  
2472. **F**  
2473. **E**  
2474. **D**  
2475. **D**  
2476. **B**  
2477. **F**  
2478. **F**  
2479. **C**  
2480. **B**  
2481. **C**  
2482. **B**  
2483. **F**  
2484. **F**  
2485. **F**  
2486. **F**  
2487. **F**  
2488. **F**  
2489. **F**  
2490. **D**  
2491. **F**  
2492. **B**  
2493. **E**

2494. **E**  
2495. **B**  
2496. **D**  
2497. **F**  
2498. **D**  
2499. **B**  
2500. **F**  
2501. **F**  
2502. **B**  
2503. **B**  
2504. **D**  
2505. **D**  
2506. **F**  
2507. **F**  
2508. **H**  
2509. **F**  
2510. **D**  
2511. **D**  
2512. **B**  
2513. **F**  
2514. **D**  
2515. **D**  
2516. **F**  
2517. **F**  
2518. **F**  
2519. **D**  
2520. **F**  
2521. **D**  
2522. **D**  
2523. **B**  
2524. **B**  
2525. **E**  
2526. **F**  
2527. **B**  
2528. **D**  
2529. **F**  
2530. **F**  
2531. **F**  
2532. **D**  
2533. **D**  
2534. **D**  
2535. **D**  
2536. **D**  
2537. **D**  
2538. **B**  
2539. **B**

2540. D  
2541. D  
2542. D  
2543. D  
2544. B  
2545. B  
2546. D  
2547. D  
2548. B  
2549. B  
2550. D  
2551. D  
2552. D  
2553. D  
2554. D  
2555. D  
2556. D  
2557. D  
2558. D  
2559. B  
2560. B  
2561. D  
2562. D  
2563. B  
2564. B  
2565. D  
2566. D  
2567. D  
2568. D  
2569. B  
2570. B  
2571. A  
2572. B  
2573. D  
2574. B  
2575. B  
2576. B  
2577. A  
2578. B  
2579. B  
2580. B  
2581. A  
2582. D  
2583. F  
2584. D  
2585. B

2586. **B**  
2587. **A**  
2588. **F**  
2589. **D**  
2590. **B**  
2591. **B**  
2592. **B**  
2593. **B**  
2594. **F**  
2595. **D**  
2596. **D**  
2597. **F**  
2598. **D**  
2599. **B**  
2600. **B**  
2601. **F**  
2602. **B**  
2603. **B**  
2604. **A**  
2605. **F**  
2606. **B**  
2607. **F**  
2608. **F**  
2609. **F**  
2610. **B**  
2611. **B**  
2612. **A**  
2613. **B**  
2614. **D**  
2615. **D**  
2616. **D**  
2617. **D**  
2618. **D**  
2619. **B**  
2620. **B**  
2621. **F**  
2622. **A**  
2623. **B**  
2624. **D**  
2625. **B**  
2626. **B**  
2627. **D**  
2628. **A**  
2629. **D**  
2630. **D**  
2631. **D**

2632. **F**  
2633. **D**  
2634. **B**  
2635. **B**  
2636. **A**  
2637. **D**  
2638. **F**  
2639. **B**  
2640. **B**  
2641. **B**  
2642. **B**  
2643. **B**  
2644. **F**  
2645. **B**  
2646. **B**  
2647. **B**  
2648. **F**  
2649. **F**  
2650. **D**  
2651. **F**  
2652. **B**  
2653. **F**  
2654. **F**  
2655. **F**  
2656. **B**  
2657. **F**  
2658. **F**  
2659. **C**  
2660. **B**  
2661. **C**  
2662. **F**  
2663. **F**  
2664. **F**  
2665. **F**  
2666. **F**  
2667. **F**  
2668. **F**  
2669. **F**  
2670. **B**  
2671. **F**  
2672. **F**  
2673. **F**  
2674. **F**  
2675. **F**  
2676. **C**  
2677. **B**

2678.	<b>F</b>
2679.	<b>C</b>
2680.	<b>F</b>
2681.	<b>F</b>
2682.	<b>F</b>
2683.	<b>F</b>
2684.	<b>F</b>
2685.	<b>B</b>
2686.	<b>D</b>
2687.	<b>D</b>
2688.	<b>F</b>
2689.	<b>F</b>
2690.	<b>F</b>
2691.	<b>F (Amended under slip rule 40)</b>
2692.	<b>B</b>
2693.	<b>F</b>
2694.	<b>C</b>
2695.	<b>D</b>
2696.	<b>C</b>
2697.	<b>B</b>
2698.	<b>F</b>
2699.	<b>D</b>
2700.	<b>C</b>
2701.	<b>D</b>
2702.	<b>C</b>
2703.	<b>D</b>
2704.	<b>C</b>
2705.	<b>F</b>
2706.	<b>F</b>
2707.	<b>D</b>
2708.	<b>F</b>
2709.	<b>F</b>
2710.	<b>F</b>
2711.	<b>F</b>
2712.	<b>E</b>
2713.	<b>A</b>
2714.	<b>F</b>
2715.	<b>F</b>
2716.	<b>D</b>
2717.	<b>B</b>
2718.	<b>A</b>
2719.	<b>D</b>
2720.	<b>C</b>
2721.	<b>E</b>
2722.	<b>E</b>
2723.	<b>E</b>



2724. E  
2725. D  
2726. E  
2727. E  
2728. E  
2729. E  
2730. F  
2731. C  
2732. B  
2733. A  
2734. D  
2735. D  
2736. E  
2737. D  
2738. B  
2739. A  
2740. D  
2741. D  
2742. B  
2743. F  
2744. B  
2745. F  
2746. B  
2747. B  
2748. B  
2749. F  
2750. F  
2751. D  
2752. B  
2753. B  
2754. B  
2755. F  
2756. F  
2757. C  
2758. B  
2759. B  
2760. F  
2761. C  
2762. F  
2763. B  
2764. F  
2765. F  
2766. D  
2767. F  
2768. D  
2769. F

2770. F  
2771. F  
2772. E  
2773. C  
2774. D  
2775. C  
2776. B  
2777. F  
2778. D  
2779. B  
2780. B  
2781. F  
2782. F  
2783. F  
2784. B  
2785. D  
2786. D  
2787. F  
2788. F  
2789. F  
2790. F  
2791. F  
2792. F  
2793. F  
2794. D

Brian Kennedy QC

First Tier Tribunal Judge

Date of Decision: 20 July 2018

Date Promulgated: 24 July 2018

Date Re-Promulgated: 13 August 2018 (Amended)