



**First-tier Tribunal
(General Regulatory Chamber)
Information Rights**

Appeal Reference: EA/2019/0234

**Determined without a hearing
Birmingham Civil and Family Justice Centre
On 30 October 2019**

**Before
JUDGE HOLMES
ANNE CHAFER
JOHN RANDALL CBE**

Between

JOHN CONNOR

Appellant

and

THE INFORMATION COMMISSIONER

Respondent

DECISION AND REASONS

The Tribunal dismisses the appeal. Decision notice, no. FS50798452, dated 21 June 2019 is confirmed, and no further action is required from the public authority.

REASONS

1. In this appeal the Appellant, John Connor appeals against a Decision Notice issued by the Information Commissioner on 21 June 2019, in which she determined that the public authority, Gateshead Council (“the Council”), was entitled to rely upon reg.12(4)(b) of the EIR to refuse the request, on the grounds that the request was manifestly unreasonable, and the balance of the public interest lay with the exception being maintained.

2. The Appellant appealed the Decision Notice by a Notice of Appeal dated 3 July 2019. In the Notice the Appellant indicated that he required a Decision without a hearing. The Commissioner filed her response to the appeal on 13 August 2019. She too was content with a paper hearing of the appeal.

3. The Appellant filed a further document, dated 9 August 2019, to which he attached some further documents, photographs of plans that he had taken on a visit to the Archives Office at Blandford House, Newcastle.

4. As the Commissioner in her response had requested that the appeal be struck out as having no reasonable prospects of success, the Appellant was, by email of 13 August 2019 (page 42 of the bundle) invited to explain why it should not be. He replied on 18 August 2019 (page 44 of the bundle). On 20 August 2019 the Registrar considered the application, and the Appellant's response, and determined that, whilst the Appellant's case may not be "the strongest", she did not consider it so hopeless that she should strike it out. The appeal has thus proceeded to a paper consideration. The Judge apologises for the delay in promulgation of this Decision, occasioned by pressure of judicial business.

5. Neither party attended the appeal hearing, which was held at Birmingham Civil and Family Justice Centre on 30 October 2019. The Tribunal had before it an open bundle, which included both parties' representations, and the various documents that each party relied upon.

The Background.

6. The request made by the Appellant which gives rise to this appeal was dated 5 September 2018 and is at page 45 of the bundle. It is in these terms:

"I request a copy of ALL documents relating to Building Regulations (Ref No. 747/73 and Town Planning relating to garage 3 Long Bank, Wrekenton, Gateshead, Tyne & Wear NE9 7HE.

I also request a copy of the planned drawing with the approved stamp (Accepted, Dated, Referenced)."

7. There is a long and complex background to this appeal. In essence the matter arises out of planning applications made by the owners of land adjacent to the Appellant's property in 1973 and 1996, in which the Appellant believes false information was provided. There are related disputes about the use of the boundary wall as a form of support for the neighbour's garage roof, and about the status of the lane to the rear of the property. The Appellant is aggrieved that the Council refused to take action against the neighbour(s) for allegedly providing the false information. The Council has failed to provide fully detailed evidence of all its dealings with the Appellant in this appeal, however these are conveniently summarised in the decision on the Appellant's earlier appeal to the Tribunal (see paragraph 12 below) EA/2019/0053 at paragraphs 3 - 11. To allow the Council the benefit of the doubt, it may have concluded, albeit wrongly, that having supplied the information to both the Information Commissioner and the Tribunal office in relation to EA/2019/0053 it did not need to do so again in relation to the current case.

8. The Appellant made a complaint to the Information Commissioner in 2017 (case reference FS50650467) about a previous information request he had submitted to the Council. After obtaining further information from the Council, the Commissioner decided to take further no action.

9. The Appellant issued legal proceedings against the Council which were unsuccessful and he was refused permission to appeal. In 2013 The Appellant issued an application for permission to judicial review, which was dismissed as being 'without merit' and the Council awarded costs. In 2014 the Appellant issued proceedings in the Newcastle District Registry of the Chancery Division, which were withdrawn. He issued further proceedings which were discontinued by him in about March 2016.

10. The Appellant made complaints to the Local Government Ombudsman (LGO) in March 2004, December 2007, and in July 2008. In 2005 the LGO informed the Appellant's solicitors that it would not pursue the complaints against the Council because there was no evidence of maladministration leading to injustice. The investigation in 2008 was discontinued by the LGO, partly because it had previously investigated the same issue.

11. In 2005 the Appellant made a complaint to Northumbria Police who declined to take any action.

12. On 12 September 2019 a differently constituted first-tier Tribunal promulgated a Decision (EA/2019/0053) in another appeal brought by the Appellant against the Information Commissioner, arising out of a Decision Notice FS50778479, which the Commissioner had issued on 30 January 2019. This was in relation to a previous request made by the Appellant to the Council for information some of which was of a very similar nature. The first-tier Tribunal dismissed the Appellant's appeal, upholding the Commissioner's decision notice, to the effect that the Council were entitled to rely upon s.14(1) of the FOIA, on the grounds that his request was vexatious.

13. The following requests, made on 25 April 2018, were those considered in EA/2019/0053:

Clarification on what was meant as set out in relation to your Part 8 Claim Form dated 22/12/2015 and the letter to the court manager dated 24 March 2016.2. Why Gateshead Council did not inform the Ombudsman that [Council Office 1] Head of Planning should not have said "only in very exceptional circumstances"

The name and position held of the Gateshead Council Employee(s) who further confirmed to the Ombudsman that [Council Officer 1], Head of Planning was correct.

A full disclosure of what would constitute "Very exceptional circumstances"

An explanation as to why Gateshead Council did not confirm that [Council Officer 1] Head of Planning should not have said "only likely to occur in very exceptional circumstances".

[Council Officer 2] should have asked any advisors or employees supplying him with the information to be included in a verified document to confirm in writing that the information was correct before he signed his statement of truth to the County Court, I request a copy of that document.

A copy of the letter from [the neighbour] to Gateshead Council requesting information that the boundary wall was in not way supporting the peaked roof. The Council's reply

The last element of that request overlaps with the current request.

The Council replied by email dated 17 May 2018 stating that no recorded or no information was held. The Appellant replied to this email on 12 June 2018 and in its response to that email on 19 June 2018 the Council stated:

"We are treating this request as vexatious. We have previously responded to you and you have complained to the Information Commissioner who agreed with our position. No further requests for information on this topic will be responded to."

14. The Appellant applied for an internal review on 23 July 2018. He received no reply and referred the matter to the Information Commissioner on 18 August 2018. The Council did not appear to have conducted any substantive internal review, but emailed the Appellant on 4 September 2018, repeating its response given, on 19 June.

This request, the Council's response to it and the involvement of the ICO.

15. It is against this background that the request at issue in this appeal was made, on 5 September 2018. The Council did not respond within the requisite 20 working day period, and the Appellant consequently wrote again on 3 October 2018 requiring a response (page 45 of the bundle). In this email he informed the Council, as he had the ICO, that he had visited the archives Newcastle and had been informed that the Council had removed the information that he had requested in 2003 (this is a little ambiguous, as it is unclear whether the Appellant meant to say that he made his request in 2003 or that the Council removed information in 2003, it seems likely to be the latter). He went on to say that he saw no reason why the Council was refusing to provide him with the information which was a very simple request.

16. Consequently, on 30 October 2018 the Appellant complained to the Information Commissioner having had no response to his request or his follow-up email, completing a s.50 complaint form (pages 47 to 50 of the bundle).

17. On 13 November 2018 the ICO contacted the Council to pursue the Appellant's complaint, and was informed of the previous requests that had been made, and the determination of the Commissioner, which was in fact then the subject of the appeal (EA/2019/0053) before the FTT, in relation to decision notice FS50778479.

18. The ICO replied to the Appellant on 14 November 2018 informing him of the Council's response that his request was being treated as vexatious, and explaining that this would be the reason why he had not received a response (pages 52 to 54 of the bundle).

19. The Appellant was informed by letter of 22 March 2019 of the investigation that the ICO was then to carry out (pages 55 to 58 of the bundle), and the ICO then duly resumed correspondence with the Council. In the ensuing discussions with the Council the ICO pointed out that the Appellant's request would appear to be for environmental information and consequently would be made under the EIR.

20. It was pointed out to the Council that a valid refusal notice under regulation 14 of the EIR would be required. It was also pointed out that the Appellant would have a right to seek an internal review of any such refusal. Having considered the matter the Council did, after some further prompting, on 1 May 2019 issue a refusal notice under the EIR (pages 64 to 65 of the bundle), in which it was stated that the Council, as had previously been advised, were treating any further requests for information on the topic of this planning application as vexatious. This refusal went on to state how the Appellant had since 2006 made 10 FOI requests, "all of which pertained to the planning application, and matters sent, building regulations, or matters pertaining to the court case."

21. The refusal notice went on to say this:

"On 15.6.16 you were advised that the only document we held pertaining to the garage at 3 long bank was a 'notice of passing of building plans' which you are provided with a copy of, as our retention period of such records is 15 years and the records have been destroyed.

I am treating this request as vexatious under regulation 12(4)(b) manifest unreasonable.

This is because unnecessary resources are having to be diverted to deal with queries which you have previously had responses to.

if you make any further requests for information in relation to this planning and building regulations matter you will not receive a response."

22. The Appellant was advised of his right to seek a review and of his right of appeal. He did seek an internal review on 1 May 2019 (pages 66 to 67 of the bundle). In that letter he informed the Council of his visit to Blandford House, the Public Record Archive in Newcastle, where he was informed that the Council had removed the documents he had requested in 2013, and was now being informed that they had been destroyed under the retention period of 15 years. He went on to ask why this file was not returned back to the archives, and why other files which were apparently older were held at the archives, when the retention policy was 15 years. He raised a number of other questions and expressed alarm at the potential destruction of documents which he considered should have been returned back to the archives. He suggested that they had been removed from the archives in order to destroy them.

23. The Council did conduct an internal review and its response (undated but apparently 9 May 2019, see page 68 of the bundle) reiterated the Council's position that any further requests on the subject of this planning application were vexatious. The reviewer made reference to the other requests that had been made on the subject since 2006, the court case, and previous decisions by the Information Commissioner to uphold the Council's decision to treat requests on this topic as vexatious. He remained of the view that it was appropriate to continue to do so, and repeated how unnecessary resources were having to be diverted to deal with the queries to which the Appellant had previously had responses. Reference was made to the advice to him in 2016 that the Council held no data, other than the certificate which had already been released to him. The letter went on to explain that some planning information may be held longer than the usual 15-year retention period if it was of importance to the history of the borough, but that this particular matter did not fall into that category of record. The original decision was accordingly upheld, and the Appellant informed further of his right appeal to the Information Commissioner.

24. The Appellant did appeal to the Information Commissioner by letter of 9 May 2019, pages 70 to 71 of the bundle. In this letter he makes further reference to his visit to the archives in Newcastle. There he saw and physically handled plans which related to the extension work which was the subject of his complaints. He queried why these documents were still held in the Newcastle archives, why they had not been requested by the Council, and had been destroyed. He made reference to planning documents that he was provided with in 2014 which went back to 1979 for a different Long Bank address. He queried what historical importance this file had, to warrant it being kept in the archives. He wanted to know who had requested the file from the archives in 2003, their name and the position they held.

25. He went on to say how it is an absolute disgrace that the information he requested had been removed from Newcastle archives by a member of Gateshead Council and destroyed. He asks "WHY?", and suggests that the reason would be that there was something to hide, and this was why it was not returned back to the Newcastle archive after use. He ends by saying that he expects, whatever the decision of the Commissioner, that all documents which had no importance to the history of the borough would be destroyed in accordance with the Council's 15-year retention policy.

26. The ICO acknowledged the appeal by letter of 14 May 2019 (pages 73 to 75 of the bundle) and wrote to the Council the same day to inform it of the investigation (pages 76 to 79 of the bundle). The Council replied to the ICO on (undated, but with a manuscript date of) 20 May 2019) referring to the long history between the Appellant and the Council since 2006 regarding a planning dispute between him and his then neighbours. The letter goes on to refer to the 10 FOI requests that had been made in that time, the unsuccessful litigation, and the two previous decisions of the Commissioner treating him as vexatious, one of which was at that time the subject of an appeal to the first-tier Tribunal. The letter goes on to refer to the advice the Appellant was given on 15 June 2016 that the information was no longer held, apart

from one document which was released to him. The text of the letter of 15 June 2016 sent to the Appellant was included in this document (pages 80 to 81 of the bundle).

27. Having considered the Appellant's complaint, and the Council's response on 21 June 2019 the Commissioner issued her Decision Notice.

The Appellant's grounds of appeal, and submissions.

28. The Appellant's Grounds of Appeal set out the historical background to his complaint, but do not clearly identify any error of law. In essence, the Appellant submits that his request was not vexatious, and that it is in the public interest that the information is provided. His appeal grounds dated 3 July 2019 refer again to his visit to Blandford House, and his successful attempt to obtain sight of some planning documents. At paras. 8 and 9 of his Grounds, he says this:

"8. Clearly had the file not been removed from Blandford House I would have obtained the information without having to go to these lengths to obtain this information.

9. On my visit to the Archives at Blandford House I requested and physically handled three files and could have obtained copies if I had wished."

29. In box 6, in which the Appellant is asked what outcome of the appeal is sought, the Appellant, after initially repeating his request for all the documents he referred to in his request, then asks:

"If these documents have been destroyed by Gateshead Council, I request the destruction documents dated and referenced."

The IC's response to the appeal.

30. The Commissioner did not appear, but her response, dated 8 August 2019, is at pages 26 to 34 of the bundle. After setting out the history and the relevant legislation, the Commissioner refers to the Court of Appeal judgment in **Dransfield & Craven v Information Commissioner [2015] EWCA Civ 454** in which the provisions of s.14(1) of the FOIA and reg.12(4)(b) of the EIR are considered and compared. Further, reference is made to the guidance in that judgment as to the test of "vexatious" to be applied in this context.

31. The Commissioner then sets out the Appellant's grounds of appeal, as gleaned from the Notice of Appeal, and supporting documents. The Commissioner submits that the Appellant has not demonstrated why the Decision Notice is wrong in law. The background information provided by the Appellant supports the conclusion that the request was vexatious, applying the test in **Dransfield**. She points out that his grounds of appeal concern his dissatisfaction with the fact that the Council removed the records from the Archives at Blandford House, and has subsequently confirmed that the information has been destroyed, and therefore is no longer held. She points

out that whether or not the information is held is not a relevant consideration to application of reg.12(4)(b) of the EIR in determining whether the request is vexatious.

32. The request is vexatious, she submits, and on the application of the public interest test, the Appellant fails because he is seeking the information to pursue his own issues, which have already been pursued and ventilated by other means, which he has exhausted. There is no truly public interest in these matters. To the extent that the Appellant is now seeking information about the destruction of previously held information, that was not the subject of his request, and he would have to make another, different, request to be provided with that information.

Legal framework

33. Reg. 12(4)(b) of the EIR provides as follows:

Exceptions to the duty to disclose environmental information

12. - (1) *Subject to paragraphs (2), (3) and (9), a public authority may refuse to disclose environmental information requested if -*

(a) an exception to disclosure applies under paragraphs (4) or (5); and

(b) in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosing the information.

(2) A public authority shall apply a presumption in favour of disclosure.

(3) To the extent that the information requested includes personal data of which the applicant is not the data subject, the personal data shall not be disclosed otherwise than in accordance with regulation 13.

(4) For the purposes of paragraph (1)(a), a public authority may refuse to disclose information to the extent that -

(a) it does not hold that information when an applicant's request is received;

(b) the request for information is manifestly unreasonable;

(c) - (e) N/a

34. The terms of the regulation are similar to, if not identical with, those of the FOIA at s.14(1) which provides an exception to the duty to respond to a request under the FOIA if it is vexatious. Guidance on applying s 14(1) is given in the decisions of the Upper Tribunal and the Court of Appeal in *Dransfield & Craven v Information Commissioner [2015] EWCA Civ 454*. As the Commissioner points out, the difference between the wording of s.14(1) and reg.12(4)(b) is “vanishingly small”. She has made reference in the Decision Notice to these principles, and has also expanded upon them in her response, at paras. 22 to 24.

35. The principles in Dransfield were summarised in the judgment of the Upper Tribunal in *CP v Information Commissioner [2016] UKUT 427 (AAC)*.

36. The Upper Tribunal held that the purpose of section 14 must be to protect the resources of the public authority from being squandered on disproportionate use of FOIA (para 10). That formulation was approved by the Court of Appeal subject to the qualification that this was an aim which could only be realised if 'the high standard set by vexatiousness is satisfied' (para 72 of the CA judgment).

37. The test under section 14 is whether the request is vexatious, not whether the requester is vexatious (para 19). The term 'vexatious' in section 14 should carry its ordinary, natural meaning within the particular statutory context of FOIA (para 24). As a starting point, a request which is annoying or irritating to the recipient may be vexatious but that is not a rule. Annoying or irritating requests are not necessarily vexatious given that one of the main purposes of FOIA is to provide citizens with a qualified right of access to official documentation and thereby a means of holding public authorities to account (para 25). The IC's guidance that the key question is whether the request is likely to cause distress, disruption or irritation without any proper or justified cause was a useful starting point as long as the emphasis was on the issue of justification (or not). An important part of the balancing exercise may involve consideration of whether or not there is an adequate or proper justification for the request (para 26).

38. Four broad issues or themes were identified by the Upper Tribunal as of relevance when deciding whether a request is vexatious. These were: (a) the burden (on the public authority and its staff); (b) the motive (of the requester); (c) the value or serious purpose (of the request); and (d) any harassment or distress (of and to staff). These considerations are not exhaustive and are not intended to create a formulaic check-list.

39. Guidance about the motive of the requester, the value or purpose of the request and harassment of or distress to staff is set out in paragraphs 34-39 of the Upper Tribunal's decision.

40. As to burden, the context and history of the particular request, in terms of the previous course of dealings between the individual requester and the public authority in question, must be considered in assessing whether the request is properly to be described as vexatious. In particular, the number, breadth, pattern and duration of previous requests may be a telling factor [para 29]. Thus, the greater the number of previous FOIA requests that the individual has made to the public authority concerned, the more likely it may be that a further request may properly be found to be vexatious. A requester who consistently submits multiple FOIA requests or associated correspondence within days of each other or who relentlessly bombards the public authority with email traffic is more likely to be found to have made a vexatious request [para 32].

41. Ultimately the question was whether a request was a manifestly unjustified, inappropriate or improper use of FOIA. Answering that question required a broad, holistic approach which emphasised the attributes of manifest unreasonableness, irresponsibility and, especially where there was a previous course of dealings, the lack of proportionality that typically characterises vexatious requests [paras 43 and 45].

42. In the Court of Appeal in **Dransfield** Arden LJ gave some additional guidance in paragraph 68:

'In my judgment the Upper Tribunal was right not to attempt to provide any comprehensive or exhaustive definition. It would be better to allow the meaning of the phrase to be winnowed out in cases that arise. However, for my own part, in the context of FOIA, I consider that the emphasis should be on an objective standard and that the starting point is that vexatiousness primarily involves making a request which has no reasonable foundation, that is, no reasonable foundation for thinking that the information sought would be of value to the requester or to the public or any section of the public. Parliament has chosen a strong word which therefore means that the hurdle of satisfying it is a high one, and that is consistent with the constitutional nature of the right. The decision maker should consider all the relevant circumstances in order to reach a balanced conclusion as to whether a request is vexatious. If it happens that a relevant motive can be discerned with a sufficient degree of assurance, it may be evidence from which vexatious business can be inferred. If a requester pursues his rights against an authority out of vengeance for some other decision of its, it may be said that his actions were improperly motivated but it may also be that his request was without reasonable foundation. But this could not be said, however vengeful the requester, if the request was aimed at the disclosure of important information which ought to be made publicly available.'

43. Nothing in the above paragraph is inconsistent with the Upper Tribunal's decision which similarly emphasised (a) the need to ensure a holistic approach was taken and (b) that the value of the request was an important but not the only factor.

44. The lack of a reasonable foundation to a request was only the starting point to an analysis which must consider all the relevant circumstances. Public interest cannot act as a 'trump card'. Rather, the public interest in the subject matter of a request is a consideration that itself need be balanced against the resource implications of the request, and any other relevant factors, in a holistic determination of whether a request is vexatious.

The role of the Tribunal

45. By the application of reg.18 of the EIR, s.58 of the FOIA applies to this appeal. This requires the Tribunal to consider whether the decision made by the Commissioner is in accordance with the law or, where the Commissioner's decision involved exercising discretion, whether she should have exercised it differently. The Tribunal may receive evidence that was not before the Commissioner and may make different findings of fact from the Commissioner. In this instance, however, there is little that was not before Commissioner when she considered the matter.

Discussion and conclusions

46. The Appellant has had a long history of litigation and complaints to the Local Government Ombudsman (LGO) regarding this matter. He also made two previous complaints to the Commissioner, references FS50650467 and FS50778479. The Council does not hold the information he has requested. He has been repeatedly advised of that in correspondence which has been ongoing since 1996. He brought proceedings against the Council which were struck out and he was ordered to pay costs. He has made two complaints to the LGO and this is the third complaint to the Commissioner.

47. The Tribunal considers the four factors identified by the Upper Tribunal to be a helpful framework to structure its consideration of whether the request was vexatious but has had regard to the fact that it is not intended to be an exhaustive definition or a checklist for determination of this issue and that a holistic approach must be taken, with no one factor acting as a trump card.

48. In approaching this issue, we bear in mind that the test is not whether the Appellant is a vexatious requestor. That is the wrong approach. It is the request that must be vexatious and not the requestor, and that is the approach we adopt. We do find that the request, as originally made, has no value and serves no real purpose. It relates purely to the Appellant's private dispute. It is to be remembered that it was for copies of "ALL documents relating to Building Regulations (Ref No. 747/73 and Town Planning relating to garage 3 Long Bank", the Appellant's emphasis. As the reference shows, this means the request goes back to 1973. As the information provided to the Tribunal shows, this is but another attempt by the Appellant to obtain information in relation to his private dispute with his neighbours and the Council which has been extensively litigated and ventilated.

49. On its own, this request would not be considered vexatious. It is the fact that it is the 11th such request (the others may have been under the FOIA, but that is a technical distinction), and is in the context of the history that has been laid before the Tribunal that makes it so. We cannot see any significant objective public interest in the information requested. The Appellant has complained about the same issue to the Council a significant number of times over a significant period of time. The Council has already informed the Appellant on numerous occasions of its decision not to take action and of the reason why no action was taken. The Appellant has pursued numerous legal actions and complaints to LGO about the same issue. The underlying grievance has been exhaustively considered and addressed. We cannot see how obtaining an answer to this request will contribute in any way to resolving the issue.

50. Rather, what we consider has now happened is that, having discovered that there may previously have been in existence information which could and arguably should have been made available during the currency of the disputes, the Appellant is now seeking further information about its retention and destruction. That, however, is not the request that he made. He made a request for information that he

had previously been told, and does not dispute, the Council did not have. It may not have had it because it had destroyed it, but the Appellant has had his answer. Making the same request, therefore, serves no useful purpose, and is vexatious. Whether a further request made in the terms suggested in the second of the Appellant's desired appeal outcomes, relating to the Council's retention or destruction of certain documents would be similarly classed as vexatious is not one which this Tribunal need consider. Such a request, however, would be a different request, and the Tribunal is quite satisfied that the request before it was vexatious, and there is no public interest in the information being disclosed.

Conclusion.

51. We have considered the history of the complaints and the litigation on this issue, and we have considered the value and purpose of this request. Looking at all these factors we find that the request was vexatious in the sense of being a manifestly unjustified, inappropriate or improper use of the EIR. In terms of burden, we find that the number, breadth and pattern of previous FOIA/EIR requests, coupled with unsuccessful litigation, complaints to the Ombudsman and to the Police amply demonstrates an unreasonable burden. In terms of motive, as the Appellant had been told, and has not challenged, that the information requested is not held, there is no reasonable foundation for the request. Similarly, there is no value or serious purpose in repeatedly renewing, albeit with minor variations, a request for information that is not held. With respect to the public interest, the interest is wholly or mainly a private interest of the Appellant. Against this, there is a very substantial public interest in protecting the resources of the public authority from a request that, given the substantive information is not held, is entirely without merit. Applying the three-stage test under regulation 12(4)(b) we conclude, taking account of all the factors and matters set out above, that the request was manifestly unreasonable, that the public interest in maintaining the exception outweighed the public interest in disclosing the information in all the circumstances, and that the presumption in favour of disclosure did not mean that the information should be disclosed.

52. For all these reasons, this appeal fails, no steps are required to be taken by the public authority, and the Commissioner's Decision Notice is confirmed.

Signed

Paul Holmes
Judge of the First-tier Tribunal

Date: 31 March 2020