APPELLANT

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

Appeal No. EA/2010/0056

BETWEEN:-

ROB EDWARDS

Appellant

and

THE INFORMATION COMMISSIONER

Respondent

and

MINISTRY OF DEFENCE

Additional Party

2nd Witness Statement of

JOHN H LARGE

in the Interest of the Appellant

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254 **Qualifications and Experience**

255 I am John H Large of the Gatehouse, 1 Repository Road, Ha Ha Road, London SE18 4BQ.

256 I have given a resume of my qualifications and experience in my 1st Witness Statement dated 14 September 2010.

257 **Introduction**

258 By e-mail 7 September 2010, the Appellant asked for copies of the submission to and the response of the qualified person relating to the Appellant's original request of 11 December 2006.

259 The submission to and response from the qualified person, both dated 4 May 2007, are referred to in Respondent's Decision Notice (§18 DN).

260 The Ministry of Defence (MoD) agreed to the Appellant's request, circulating copies of the submission and response to all parties on 15 September 2010.

261 **Instructions**

262 On 15 September 2010, the Appellant asked me to prepare a 2nd Witness Statement dealing with aspects of the submission/response that he was previously unaware of and which he considered to be directly relevant to his appeal to the Tribunal.

263 As for my 1st witness statement, I agreed to do so pro bono.

264 I shall deal with both the submission[1] to (eg §1 SQP) and response[2] from (eg §2 QPR) the qualified person, where I refer to my 1st witness statement thus (eg §3 JL1), sections in this 2nd witness statement as (¶4 JL2) and, as previously, to the Respondent's Decision Notice of 4 February 2010 as (eg §5 DN).

265 **D) FULLNESS OF THE SUBMISSION AND RESPONSE OF THE QUALIFIED PERSON**

266 In the Decision Notice the Respondent noted that the qualified person was provided with a *"full submission"* by the MoD (§38 DN) – the submission referred to here is the SQP and any attachments thereto.

267 As I explored in my 1st witness statement (§§210 to 213 JL1), it is not at all clear how the Respondent arrived at this conclusion.

268 Although I am not privy to the process adopted by the Respondent for making and arriving at the fullness of the conclusion, it is reasonable to assume[10] that he would generally consider two main factors: these are **i)** what information, relevant factors, etc., the qualified person took into account when forming his opinion and **ii)** the content of the disputed information itself as known to the qualified person.

269 For a busy Crown Minister **i)** will most probably comprise just the information contained in the submission (SQP) prepared by the MoD officials, so the relevant factors to be considered by the qualified person are only those contained within the submission, particularly §9 SQP

1 Freedom of Information Act Request 12-12-2006-075324-002 Edwards – Request for Approval of Use of S36(2), 4 May 2007 – Submission to the Qualified Person - http://www.largeassociates.com/3189%20Rob%20Edwards/7-%2020070504-Tribunal-Edwards-s36%20sub-OPEN.pdf

2 Freedom of Information Act Request 12-12-2006-075324-002 Edwards – Request for Approval of Use of S36(2), 4 May 2007 – Response of the Qualified Person - http://www.largeassociates.com/3189%20Rob%20Edwards/8-%2020070504-Tribunal-Edwards-Min%20rep-OPEN.pdf

relating to S36(2)(b)(i). I consider it unlikely that the qualified person[3] had any prior knowledge of or expertise in the range of topics and technologies encompassed by documents sought by the Appellant and, if so, there was no foreknowledge to supplement §9 SQP.

270 However, §9 SQP only relates issues that favour non-disclosure, I précis these as follows:

271 *". . . It is in the public interest that Regulators have the necessary space to effectively regulate . . . be free to express these findings . . in candid assessment reports . . the need to protect the space for regulators . . must be protected . . Regulators may wish to express a frank opinion . . if such criticism were to be publicised Regulators could be discouraged from offering opinions, degrading the quality of reports . . leave insufficient information to make improvements . . the disclosure of information which might have these consequences is clearly strongly against the public interest. . ."*

my truncation . .

272 In fact §9 SQP, or elsewhere in the submission, provides no counterpoint offsetting this unabashedly 'for non-disclosure' reasoning, that is there are no relevant factors identified as to why it might be in the public interest to disclose the information.

273 Indeed, §9 SQP promotes that even positive comments of the regulators must also be safeguarded from public gaze:

274 *". . . While there may be much in the reports that shows good practice and gives assurance that the areas regulated are both safe and improving, the need to protect the space for regulators to make comment – be it good or bad – must be protected . . ."*

my truncation . .

275 Assuming that the qualified person had no prior knowledge of the subject matter (¶269 JL2), the only other source of information for **i)** would have been via the PITs referred to in §10 SQP[4] and which were available *"if required"* (§Annex A SQP).

276 However in response to the Appellant's request of 7 September 2010 **all** of the submission placed before the qualified person, since the MoD has provided the Tribunal parties with

3 At the time of the submission the qualified person was Adam Ingram who was then Member for East Kilbride, Strathaven and Lesmahagow and Crown Minister for the Armed Forces – there is nothing in Mr Ingram's pre-parliamentary employment and education (about 10 years as a computer programmer, thereafter a trade union official with NALGO and a local councillor until entry into Parliament in 1987) to suggest any extraordinary understanding of military-nuclear matters – see http://en.wikipedia.org/wiki/Adam_Ingram_(Labour_politician)

4 The SQP contains a paragraph numbering error – here the 1st para 10 is referred to – and there is another paragraph error on the QPR where item 2 d) is skipped – these errors beg the question of whether these are complete copies of the original SQP and QPR documents.

copies of just the SQP and QPR, and not the PITs analyses, I assume that the detailed PITs analyses were never requested by or shown to the qualified person[5] (and, quite possibly, the Respondent).[8]

277 I should explain here that in preparing for the final SQP, first, the MoD prepared a draft in the form of loose minute for approval by DNSR[6] – this DNSR approved[7] draft record contains much the same preamble as the final SQP but is annexed with the detailed PITs analyses, each set out in tabular form in Annexes B-1, 2, 3 and 4, and C. This DNSR record was then amended, essentially reduced and simplified, with the PITs analyses reduced to a short summary in terms of just the qualified exemptions that DNSR believed should be engaged, which were presented in a single table attached as Annex A to the final SQP.

278 In this way, unless the qualified person specifically requested the PITs analyses, all that was put in front of him via the SQP was the outcome of the analyses in terms of which qualified exemptions to be engaged.

279 I can illustrate this by reproducing the tabulated presentation of the first two documents of the Appellant's request (§Annex A SQP):

Document	Exemptions considered	Recommendation
(1) Draft DSC report AWE	S36.2(b).i	Seek approval to use S36. 2(b)1. Withhold whole document
(2) Indian Footprint 06 Report	S27, S36. 2(b) i, 38 and MOD FOI Guidance Note 9	(i) Withhold author's personal name. (ii) apply S27. (iii) Seek approval to use S36. 2(b)1. If obtained some information can be given in a redacted version of the document.
. . .		

Source: Table of Annex A SQP

280 From which the qualified person has no sense of the public interest arguments taken into account, any weighting applied to these, and the final margin of balance favouring, in this case, non-disclosure for each of the five documents subjected to PITs.

5 In response to the Appellant's request for the submission to and response of the qualified person, the clear understanding was that the full SQP and QPR would be provided but that any attachments might have to be redacted in part – the MoD acknowledges this in its e-mail of 10 September 2010 - from which it might be reasonably assumed that if the full PITs analysis and the *disputed information* had been placed before the qualified person then these would have been included with the copies in a form appropriately redacted but, since they were not, it follows that the qualified person did not request and see this documentation during his consideration - http://www.largeassociates.com/3189%20Rob%20Edwards/10%2009%2010%20EA_2010_0056;%20Rob%20Edwards%20v%20Information%20Commissioner%20&%20MOD.eml

6 Submission D/TES/BSG/80/20/30/2, 30 April 2007 being an Exhibit of Cdre (Retd) Andrew McFarlane's witness statement of 17 September 2010 - http://www.largeassociates.com/3189%20Rob%20Edwards/1-%2020070430-Tribunal-Edwards-PIT%20submission%20TRIBUNAL.pdf

7 DNSR approval DNSR/3/6/2 of 4 May 2007 - http://www.largeassociates.com/3189%20Rob%20Edwards/2-%2020070504-Tribunal-Edwards-PIT%20authorisation%20TRIBUNAL.pdf

281 Similarly, other than the listing of the titles of the documents requested by the Appellant (§2a SQP), there is nothing in the SQP to suggest that the **ii)** disputed information itself was actually put before the qualified person.[5]

282 **In conclusion of Section D:** The point here is not that of whether the qualified person's opinion was *reasonably arrived at* and *reasonable in substance*, but how the Respondent judged it to be so from the exiguity of the submission provided to the qualified person.

283 My understanding is that the Information Commissioner's expectation[10] is that in reaching an opinion the qualified person should have considered:

284 a) the disputed information itself, or a summary or description of that information;

285 b) arguments or recommendations in favour of applying S36 for non-disclosure;

286 c) contrary arguments for disclosure;

287 d) any other relevant matters;

288 and in reaching an opinion there should be a note of

289 e) which factors were taken into account; and

290 f) public interest test considerations, including which factors were taken into account and the weight attached to them.

291 In other words, to arrive at a judgment on the reasonableness, etc., of the opinion of the qualified person the Respondent needed to see what was put in front of the qualified person when he reached his opinion and what he took into account in doing so.

292 For **a)** above, the SQP provides a minimal description of the disputed information (§§5 to 7 SQP), so much so, that all that the qualified person could have considered for this element of his opinion would have been the document titles (§2a SQP) and very little else.[5]

293 As previously noted, for **b)** and **c)** above, §9 SQP provides only factors relating to non-disclosure for reasons of S36(2)(b)(i) and there are no contrary arguments presented.

294 For **d)** above, the relevant matters have not been listed, but see (¶270 JL2).

295 Moving on to the qualified person's response **e)** and **f)**: §2e QPR somewhat confusingly refers to an entirely separate and unconnected request made by the Appellant prior to the

request of 11 December 2006, and it is only the single sentence of §3 QPR that purports to note which factors were taken into account by the qualified person in reaching an opinion:

296 *". . . The Minister has agreed to the **results** of the Public Interest Tests with respect to the documents in accordance with Government FOI policy that Ministerial approval is require {sic} if qualified exemption S36 is to be invoked."*

my ***emphasis***

297 Because the qualified person did not take up the offer of examining the detailed PITs balancing analysis (¶275 JL2),[5] this suggests to me that the qualified person relied solely on the summarised results of S36 PITs (see SQP table extract - ¶278 JL2) as these were scantily presented in the SQP (§Annex A SQP).[8]

298 In my 1st witness statement I considered how and to what extent the Respondent judged the qualified person's opinion to be reasonable in substance and reasonably arrived at. I noted (§211 JL1) that without any detailed explanation the Respondent finally arrived at a view on the substance from the *". . sensitive nature of the information . . "* and that it was *" . . intended for a small audience within the public authority and government . . "* (§37 DN).

299 However, there is no indication that the qualified person considered the *'sensitive nature'* and *'small audience'* aspects when reaching the opinion, because these phrases (nor meanings) are not present and thus are not relevant factors identified in either the SQP or QPR.

300 These factors seem to have been introduced entirely at the Respondent's volition, and in doing so infringing on the sovereignty of the qualified person's opinion – I discuss this aspect of the Respondent's intrusion into and misrepresentation of the qualified person's opinion in my 1st witness statement (§33 and §130 JL1) and later in this witness statement (**(**(¶335 JL2).

301 Hence, the Respondent was wrong in judging the submission made to the qualified person to be a *"full submission".*

302 As for the actual opinion of the qualified person, the SQP and QPR show that the Respondent's expectations of **a)** to **d)** (¶¶284 to 286 JL2) were not at all satisfied. That is the Minister was not given impartial advice by the MoD officials and thus he could not be

8 It does not seem that for the preparation of the Decision Notice the Respondent had access to the DNSR approved draft record (¶320 JL2) detailing the PITs analyses.

expected to have balanced the pros and cons as to whether releasing the disputed information was or was not in the public interest.

303 In other words, presented with such a limited, incomplete and biased submission previously formulated by MoD officials (the bones of which had been approved by DNSR), the qualified person was only asked to rubber stamp a decision for non-disclosure.[9]

304 Indeed, it is not surprising that the record of the qualified person's opinion (¶296 JL2), being so devoid of detail, falls far short of the Information Commissioner Office's own guideline[10] in that it fails to include i) which activity is likely to be prejudiced; and ii) why the activity is likely to be prejudiced [para 8, page 3 ICO 10].

305 **E) RELEVANT FACTORS**

306 In the Decision Notice the Respondent expressed satisfaction that the qualified person gave his opinion *". . after taking into account only relevant factors . ."* (§38 DN).

307 The SQP provided the qualified person with the relevant factors and, supposedly, the QPR records which of these were taken into account.

308 The SQP does not specifically identify *'relevant factors'* but, that said, since the submission to the qualified person is prepared by an informed source (essentially DNSR), all of the information contained therein must be considered to be relevant to the opinion to be arrived at by the qualified person.

309 The SQP lists a series of information points under the heading *'Recommendation'*, including items **c)** to **e)** under §2 SQP which I summarise as follows, seriatim

310 c) scant details of a separate request of another journalist and that a similar SQP is in preparation;

9 Indeed, this rubber stamping taken for granted because even at the drafting stage the draft submission assumes that the Minister will support the request to engage S36(2)(b)(i) and withhold the information since a draft reply to the Appellant has been drawn up in advance of Ministerial approval being granted [para 2(iii) DNSR 14]. Also, of incidental interest, it is noted [para 4 DNSR 14] that the date for a further response to the Appellant can be, as a matter of routine, held back until 30 May 2007, that is extending the Appellant's original request of December 2006 to about six months with apparent disregard for the time scales specified in the FoI Act (20 working days) and the recommendations of the Commissioner for completion of 40 working days, even for the most difficult and/or complex of requests.

10 Freedom of Information Act (2000) and Environmental Information Regulations (2004) Section 36 of the FOIA: *What should be recorded when considering the exemption?*, ICO, 17 December Version 1.0 - http://www.largeassociates.com/3189%20Rob%20Edwards/section_36_practicalities_v1.pdf

311 d) that, previous to the Appellant's present request of December 2006, an earlier (but unconnected) request from the Appellant had warranted engagement of S36;[11] and

312 e) that the qualified person should endorse the results of the PITs summarised in the table of the annex

313 of which I consider only §2e) SQP relating to the PITs (albeit just summary results) has any direct relevance to the Appellant's request of 11 December 2006 (and the subsequent complaint).

314 Similarly, the SQP lists under the heading *'Background'* the following (§4 SQP)

315 *"The applicant, Mr Rob Edwards, is an environmental journalist who generally writes from an **anti-nuclear standpoint**. He is an avid user of the FOI Act and often appeals against RFIs where all information is not provided."*

my ***emphasis***

316 In my 1st witness statement I postulated if the Appellant's requests could have been subject to a harsher redaction regime (§§178 to 182 JL1) because of his professional calling as a journalist, although at that time I had no firm evidence that the Appellant's calling had been identified to the qualified person.

317 On that basis, I went on to note my understanding that the FoI Act did not facilitate any such differential treatment between one individual to another (§183 JL1).

318 **In conclusion of Section E:** I consider that the SQP introduces a number or irrelevant, if not spurious factors that could have swayed and/or prejudiced the qualified person's opinion.

319 It is not at all clear from the Respondent's statement *". . that the qualified person gave his opinion after taking into account **only** relevant factors . . "* (§38 DN – my ***emphasis***).

320 In this respect, it is difficult to accept that the so obviously irrelevant SQP statement claiming the *'anti-nuclear standpoint'* of the Appellant could be put out of the mind and that it would not have, to some degree, swayed the opinion of the qualified person.[12]

11 Here item d) is being deployed as a precedent and it seems to be purely coincidental that the Appellant himself provides the precedent for his later and unconnected request – as to the validity of the precedent see (¶¶346 to 350 JL2)..

12 It is of interest to note that sometime in the period of DNSR's 4 May 2007 approval of the draft submission [DNSR 7] and the issued of the final SQP of the same day, to the description of the Appellant's work is has added (§4 SQP) '. . *generally*

321 Furthermore, I consider that this emotionally charged statement (§4 SQP) to be irrelevant to the opinion of the qualified person but, since it was included in the SQP, it was potentially prejudicial against the treatment of the Appellant's request of 11 December 2006.[13]

322 The Respondent should have stated, in his judgment, if the introduction of such spurious, irrelevant and, sometimes, prejudicial information was a proper inclusion into the SQP for consideration by the qualified person.

323 **F) PUBLIC INTEREST TESTS**

324 In my 1st witness statement, I considered the Respondent's reference to two terms purportedly used by the MoD in its public interest arguments.

325 The first of these terms *'public outcry'* is promoted as being directly attributable to the MoD, being reproduced in quotes *". ."* as an argument presented by the public authority, here the MoD (§44 DN).

326 I have searched through all of the open documents made available to the Tribunal, particularly *Annex B* and *C* of the MoD internal submission[14] [Annex B-1, 2, 3 & 4, C DNSR 14] referred to in paragraph 5 of the witness statement of Cdre (Retd) Andrew McFarlane - these annexes set out the PITs undertaken and approved by DNSR.

327 I find no mention of *'public outcry'* in any of the documents made available to the Tribunal.

328 It is not so clear that the second of these terms *'chilling effect'* is directly attributable to the MoD, although it is presented by the Respondent as if it were when considering the balance of the public interest arguments (§45 DN).

329 Again, I have searched through the open documents made available to the Tribunal and I find no mention of the *'chilling effect'*.

330 There are two other documents that are not available to me.

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writes from an anti-nuclear standpoint . ." which does not appear in the original draft SQP approved by DNSR [para 10 & 11, DNSR 14].

13 Also, from my knowledge of the Appellant's published work and other than that he is a well-respected and established journalist who publishes in the environmental area, the statement is factually incorrect and largely unsubstantiated.

14 Submission D/TES/BSG/80/20/30/2, 30 April 2007 – Annex B-1, 2, 3 and 4, and C set out the PITs for each of the documents requested by the Appellant - http://www.largeassociates.com/3189%20Rob%20Edwards/1-%2020070430-Tribunal-Edwards-PIT%20submission%20TRIBUNAL.pdf - this is an internal MoD draft submission for review and approval by DNSR and was not submitted to the qualified person.

331 One of these is the *Confidential Annex* (§76 DN), although this seems to deal exclusively with S27(1)(a) which is of no concern here, so I would not expect this to include the phrases *'chilling effect'* and *'public outcry'* as applied by the Respondent to the engagement of S36(2)(b)(i)

332 The second document is the response of the MoD to the Respondent by letter of 23 March 2009 (§16 DN) but this seems to have been concerned with administrational aspects of the MoD's response to the Respondent. Again, I would not expect this administrational letter to include the phrases *'chilling effect'* and *'public outcry'*.

333 **In conclusion of Section F:** In my 1st witness statement I commented on the inclusion and strong dependency upon these two phrases by the Respondent when endorsing the MoD's PIT arguments; that the use was fanciful (§251 JL1); and that the source of the MoD's use, particularly of *'public outcry'*, should have been properly identified in the Decision Notice (§248 JL1).

334 The point here is that the SQP makes no reference to the *'chilling effect'* and the fear of *'public outcry'* so, it follows, that these would not have been *relevant factors* in the mind's eye of the qualified person when arriving at the opinion. This means, surely, if these phrases were not part of the MoD's PITs analysis and not expressed within the SQP to the qualified person, then the remaining possibility is that the Respondent himself introduced each phrase.

335 This leads me to suggest that the Respondent may have fallen into the conundrum of forming his own view on the likelihood of prejudice arising from the disclosure of (any part of) the disputed information (in order to determine the correctness of the process), thereby supplanting the opinion given by the qualified person rather than, as is required of the Respondent, examining just the process of the reasonableness and substance of the qualified person's opinion.

336 **G) OTHER POINTS OF ISSUE**

337 There are some other points of issue and/or clarification that are raised by the release of the SQP and it draft in the form of a loose minute[6] – I shall deal with these briefly as follows:

338 **1) Conflicting Definitions of S36(2)(b)(i) Engagement**

339 In my 1st witness statement I examined the conflict between the Respondent and the MoD as to the engagement of S36(2)(b)(i), and the extent to which is has been engaged

to each of the documents originally requested by the Appellant (§§51 to 87 JL1). I summarised the differences between the MoD's stated engagement of S36, compared to the qualified exemptions that the Respondent claimed the MoD had actually engaged in Table 1 (§56 JL1).

340 My Table 1 ((§56 JL1 - centre column) matches both i) the results of the public interest tests (PITs) that are summarised in the table (right-hand column) of Annex A of the SQP, and ii) the balance on interest decision following the tables of Annexes B1, 2, 3, 4 and C of the DNSR approved loose minute.[6]

341 In conclusion: The recently released SQP provides further confirmation of the MoD's approach to and actual engagement of S36(2)(b)(i) remains at odds with qualified exemptions that the Respondent claims were engaged.

342 **2) Incorrect Engagement of S36(2)(b)(i)**

343 Annex B-1 of the DNSR loose minute[6] states that the disclosure of the AWE report would potentially undermine the DNSC's (Defence Nuclear Safety Committee) relationship with the Minister (see right-hand column of Annex table) and, on this basis, the decision was to seek engagement of S36(2)(b)(i).

344 Although closely related to S36 (prejudice to the effective conduct of public affairs) the DNSR PIT is reasoning for and against the balance prejudicing ministerial communications, so S35 should have been considered for engagement as a class-based exemption.

345 In conclusion: What seems an obvious error on the part of DNSR would have been, surely, picked up by the Respondent and referred to in the Decision Notice. The fact that it was not, again suggests that the Respondent had not examined all of the relevant information when considering the Appellant's complaint.

346 **3) The Regulatory Space**

347 The loose minute[6] makes a number of references to the *'regulatory space'* [para 6, 7 & 8 DNSR 14] and there are similar, although less specific, referrals to *'space'* in §9 SQP.

348 The basis of the argument put by DNSR is that it is necessary to protect the regulatory *'space to make comment and criticism'* even though *'some of the information being*

withheld is in itself innocuous or if released would shed good light on both the Regulator and the Regulated' [para 6 DNSR 14]. For this, DNSR considers that S36(2)(b)(i) *'allows for the protection of the regulatory space by protecting the free and frank provision of advice . . .'* [para 7 DNSR 14].

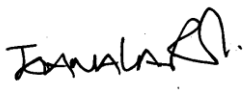
349 As I speculated in my 1st witness statement (§§81 to 85 JL1), the MoD's broad brush redaction engaged S36(2)(b)(i) as if it were a class-based exemption. The DNSR's definition, indeed, invention of the *'regulatory space'* and its *'protection'* confirms this to be so.

350 In conclusion: DNSR's novel engagement of S36(2)(b)(i) to *'protect'* the *'regulatory space'* should have been seized upon by the Respondent as being a unique, and to my mind, inappropriate use of S36(2)(b)(i).

351 **CONCLUDING OBSERVATIONS**

352 I consider that the information requested by and made available to the Appellant by the MoD on 15 September 2010 confirms and reinforces the arguments, the section and final conclusions and observations of my 1st witness statement.

353 I state here that I confirm that I have made clear which facts and matters referred to in this Witness Statement that are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refe**r.**



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1ST ISSUE	REVISION NO	APPROVED	CURRENT ISSUE DATE
15 SEPTEMBER 2010	R3189-A5 EA-2010-0056-10-1385		**21 SEPTEMBER 2010**

APPENDIX A

LIST OF DOCUMENTS TO BE ATTACHED TO THE 2ND WITNESS STATEMENT OF JOHN LARGE

EXHIBIT	TITLE	JHL PARA REF	URL ADDRESS
	Submission to the qualified person - SQR	264	http://www.largeassociates.com/3189%20Rob%20Edwards/7-%2020070504-Tribunal-Edwards-s36%20sub-OPEN.pdf
	Response from the qualified person - QPR	264	http://www.largeassociates.com/3189%20Rob%20Edwards/8-%2020070504-Tribunal-Edwards-Min%20rep-OPEN.pdf
	Appellant's e-mail request for submission etc of 7 September 2010 and responses thereafter	276	http://www.largeassociates.com/3189%20Rob%20Edwards/10%2009%2010%20EA_2010_0056;%20Rob%20Edwards%20v%20Information%20Commissioner%20&%20MOD.eml
[DNSR 14]	Submission D/TES/BSG/80/20/30/2, 30 April 2007	277	http://www.largeassociates.com/3189%20Rob%20Edwards/1-%2020070430-Tribunal-Edwards-PIT%20submission%20TRIBUNAL.pdf
[DNSR 7]	DNSR approval DNSR/3/6/2 of 4 May 2007	277	http://www.largeassociates.com/3189%20Rob%20Edwards/2-%2020070504-Tribunal-Edwards-PIT%20authorisation%20TRIBUNAL.pdf
[ICO 10]	Freedom of Information Act (2000) and Environmental Information Regulations (2004) Section 36 of the FOIA: What should be recorded when considering the exemption?, ICO, 17 December Version 1.0	304	http://www.largeassociates.com/3189%20Rob%20Edwards/section_36_practicalities_v1.pdf