

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 30 April 2013

Public Authority: East Sussex County Council
Address: County Hall
St Anne's Crescent
Lewes
East Sussex
BN7 1UE

Decision (including any steps ordered)

1. The complainant made requests to East Sussex County Council ("the council") relating to issues involving his wife. The council cited section 14(1) of the Freedom of Information Act 2000 ("the FOIA"), the exclusion relating to vexatious requests. The council also said that some of the requests should be considered separately under the terms of the Data Protection Act 1998 ("the DPA").
2. The Commissioner's decision is that the council correctly relied on the exclusion under section 14(1) in relation to information that falls within the scope of the FOIA.
3. The Commissioner does not require any steps to be taken.

Request and response

4. Between 20 and 28 August 2012, the complainant made a large number of requests to the council. These requests were given the following reference numbers by the council: 1545, 1546, 1547, 1548, 1551 and 1562.
5. The requests were refused by the council on 4 September 2012. The council cited section 14(1) of the FOIA.

6. Further requests were then submitted by the complainant between 6 and 17 September 2012. These were given the following reference numbers by the council: 1583, 1595 and 1607.
7. The council issued a further refusal notice on 6 September 2012 relating to request 1583 citing section 14(1) once more. Request 1595 was refused for the same reason on 11 September 2012. The final request was again refused although the council said that it wished to exercise its right under section 17(6) not to issue a refusal notice when it was not reasonable for it to do so.
8. The complainant requested an internal review on 5 September 2012 and, the Commissioner understands, in subsequent correspondence.
9. The council completed its internal review on 18 September 2012. It said that it wished to maintain that its refusal under section 14(1) was correct, although the council conceded that some of the requests should be considered as separate subject access requests under the DPA. The council referred to on-going correspondence about this.
10. On 14 October 2012, the complainant submitted another request. This was given the council reference number 1696. The request was refused on 22 October 2012 although the council said that it would not be reasonable to expect a further full refusal notice.
11. For clarity, because of the voluminous nature of the requests concerned, the Commissioner has quoted the requests in an annex at the end of this notice.

Scope of the case

12. On 1 October 2012, the complainant contacted the Commissioner to complain about the way his request for information had been handled. He asked the Commissioner to consider whether the council correctly refused to respond to his requests using section 14(1) of the FOIA.
13. A requester's own personal data is exempt under section 40(1) of the FOIA. Personal data is defined by the DPA as any information relating to a living and identifiable individual. For clarity, the Commissioner agrees with the council that the majority of the requests made should be considered under the terms of the DPA and the separate rights of access provided by section 7. These rights are known as the rights of subject access. The Commissioner considers that this concerns not only the complainant's own personal data but, at the time of the requests, also that of his wife, since the complainant had legal authority to act on her behalf in relation to personal welfare when he made the requests. As

mentioned in the background section of this notice below, the Commissioner understands that this was recently revoked. The Commissioner's obligation under the DPA is to conduct an assessment. This has been carried out separately. For clarity, the Commissioner does not consider that it is necessary, for the purposes of this decision notice, to establish precisely the extent to which the requests or parts of the requests should be considered under the DPA. This notice relates to the requests to the extent that the information falls under the scope of the FOIA.

Reasons for decision

Section 14(1) – Vexatious requests

14. Section 1(1) provides a general right of access to recorded information that is held by public authorities. Section 14(1) of the FOIA states the following:

"Section 1(1) does not oblige a public authority to comply with a request for information if the request is vexatious".

15. Guidance on vexatious requests is available on the Commissioner's website at www.ico.org.uk and for ease of reference, at the following link:

http://www.ico.org.uk/for_organisations/guidance_index/~media/documents/library/Freedom_of_Information/Detailed_specialist_guides/vexatious_and_repeated_requests.ashx

16. As explained in the guidance, when considering if a request for information is vexatious, the Commissioner will consider the argument and evidence that the complainant and the public authority is able to provide. The Commissioner's analysis will generally focus on the following questions:

- Could the request fairly be seen as obsessive?
- Is the request harassing the authority or causing distress to staff?
- Would complying with the request impose a significant burden in terms of expense and distraction?
- Is the request designed to cause disruption or annoyance?
- Does the request lack any serious purpose or value?

17. It will not be necessary for all of the above criteria to apply but in general, the more that apply, the stronger the case for a vexatious

request will be. The Commissioner is able to take into account the history and context of the request.

Background

18. When a request for information is refused as vexatious, it is often the case that an examination of the background will reveal a long and difficult relationship between the parties that has arisen as a result of an original dispute. This is clearly relevant in this particular case. The background to these requests is particularly involved as explained below.
19. The council explained to the Commissioner that the complainant first engaged with the council in September 2011 when he expressed concerns about the on-going health needs of his wife. On 15 September 2011, the complainant was registered as having Lasting Power of Attorney ("LPA") in relation to his wife's property and affairs.
20. In December 2011, the complainant's wife requested respite care and was accommodated in a local authority residential care home. Around this time, an investigation commenced in relation to the complainant's wife. Shortly after this, the complainant was registered as having LPA in relation to his wife's health and welfare in January 2012.
21. The complainant subsequently made a number of requests to the council for information relating to the on-going investigation. The council declined to respond because of the risk of prejudice while the investigation was on-going. As the investigation progressed, the complainant made a number of complaints to the council about the way the investigation was being conducted. Again, the council declined to consider these complaints while the investigation was on-going. The complainant subsequently complained about that decision and contacted a significant number of council departments as well as senior officers and members.
22. On 21 February 2012, the complainant issued proceedings in the county court against two senior members of the council's staff. He subsequently withdrew both claims and commenced another claim against another senior member of the council's staff. Following this, costs were awarded to the council. The complainant sought to recover the costs but this further claim was dismissed as being "without merit and an abuse of process".
23. At the same time, the complainant complained to the Local Government Ombudsman ("the LGO") who declined to investigate as it was appropriate for the council to consider the matters once the investigation had concluded.

24. Shortly afterwards, the complainant's son applied to the Court of Protection to challenge the complainant's LPA over his wife's affairs. The council was joined to those proceedings by an order dated 9 May 2012.
25. Between 12 February and 15 May 2012, the complainant wrote to the council on various occasions to request information, all of which broadly related to the handling of matters concerning his wife. The council provided some of this information, and provided additional information following the conclusion of the investigation on 16 April 2012. The council also said that it responded fully to the complainant's complaints at the end of April. The requests made by the complainant during this period were the subject of a separate complaint to the Commissioner. A formal decision notice was issued on 10 December 2012 under case reference FS50461190 and this may be accessed on the Commissioner's website for ease of reference at the following link:

http://www.ico.org.uk/~media/documents/decisionnotices/2012/fs_50461190.ashx
26. On 3 July 2012, the council submitted a statement relating to the Court of Protection proceedings. The complainant subsequently made a number of complaints about this statement including a further complaint to the LGO, which the LGO again declined to investigate because other bodies were better placed to consider those concerns.
27. The council said that the complainant also sought an injunction against the council, commenced three human rights claims, a defamation claim and a further claim against a senior member of the council's staff. The council said that all of these claims were struck out except for the outstanding claim against the senior member of staff. At the time of writing this notice, the court's decision is still outstanding relating to the latter issue.
28. In July 2012, the council undertook a full review of all of the complainant's complaints and it provided its final response on 1 and 8 August 2012. At this stage, the complainant was informed that the council would not consider his complaints any further and the council's correspondence referred to the council's policy for responding to unreasonably persistent complainants. This prompted a further complaint from the complainant to the LGO about the application of this policy which is, at the time of writing this notice, under investigation by the LGO.
29. As the Commissioner was preparing to issue this notice, the council informed the Commissioner that there had been an outcome to the court proceedings referred to in paragraph 24, and the LPA relating to

personal welfare had been revoked and the LPA relating to property and affairs was not valid. The Commissioner would like to highlight that only circumstances that existed at the time of the request are relevant to the Commissioner's analysis set out below.

Could the requests fairly be seen as obsessive?

30. The council explained to the Commissioner that it considered that the complainant's continual correspondence with the council had reached a point where it could be fairly characterised as obsessive. The council said that all of the complainant's correspondence and requests relate to the care of his wife, the investigation conducted by the council, the Court of Protection matters and complaints made in respect of these issues. It said that the complainant's correspondence about these issues had been extremely voluminous and frequent over a long period of time.
31. The council said that since 23 February 2012 alone, the complainant had submitted 33 requests for information to the council's Freedom of Information Team under both the FOIA and the DPA. The complainant had also made 20 requests directly to the council's Adult Social Care Directorate and the Legal Services Department, making a total of 53 requests in six months. It is worth noting the complainant's requests are generally always multi-faceted, adding to the total number of individual requests submitted in any given item of correspondence. (The requests forming the subject of this complaint as shown in the annex to this notice are representative samples of the requester's style). On 7 June 2012, the complainant submitted 7 letters to the council. The council said that throughout his correspondence with the council, the complainant had demonstrated a tendency to send multiple emails, often within minutes of each other and to multiple recipients. Any responses provided by the council often resulted in further complaints and requests. The council added that issuing the refusal notice on 4 September 2012 had not changed the complainant's behaviour, and the amount of correspondence sent in relation to this issue had continued to escalate.
32. The council referred to the Upper Tribunal's decision in the recent case of the *Information Commissioner v Dransfield and Devon County Council* [2012] UKUT 440 (AAC) and said that the Tribunal's comments at paragraph 32 support its general position. The Tribunal said:

"...a requester who consistently submits multiple FOIA requests or associated correspondence within days of each other, or relentlessly bombards the public authority with email traffic, is more likely to be found to have made a vexatious request".

33. The council said that it was not only the frequency and volume of the requests and related correspondence that demonstrated the obsessive nature of the requests but also their complexity, their repetitive nature, sometimes seeking information that the complainant already possesses (for example see request 10 in the annex), the way they are often cross-referenced to other requests and copied in to multiple recipients and sometimes do not clearly relate to recorded information. The council also highlighted the timing of the complainant's emails which often reveals that they were sent to the council very late at night.
34. The council also argued that the requests represented an attempt to re-open dialogue with the council when the council had already completed its complaints process and provided thorough responses to the complainant, and the complainant had also already had the opportunity to pursue his concerns through independent third parties. The council said that so far, those third party outcomes have revealed that the complainant's concerns were without merit. The council said that further evidence that the requests were intended to reopen an essentially closed dialogue was that the complainant's emails often seek to add or argue points, clarify points or challenge decisions that have been made. The council said that the requests are often mingled with accusations and complaints.
35. The Commissioner invited the complainant to explain the reasons why he does not consider that the requests were vexatious. The complainant wrote to the Commissioner and highlighted that in his view, when he makes requests to the council, he is acting on behalf of his wife who cannot act for herself. As mentioned in the scope section of this notice, the Commissioner and the council accept that the majority of the requests forming the subject of this particular complaint should actually be considered separately under the terms of the DPA. That is the proper forum in which to consider the release of personal data following a subject access request. The complainant should note for future reference that disclosures made under the FOIA are to the general public rather than only to the individual making the request. Given the rights of subject access, the complainant has not been disadvantaged in attempting to act on his wife's behalf by the use of section 14(1) under the FOIA. The strength of the complainant's point in that regard is therefore substantially weakened in the Commissioner's view although he accepts that this may be a mitigating circumstance to take into account in respect of the overall pattern of some of the correspondence. As always however, there is always the question of degree.
36. Having regard to all the circumstances described above, the Commissioner decided that it was reasonable for the council to

characterise the requests as obsessive. By way of evidence of the substantial and frequent correspondence it had received from the complainant, the council provided to the Commissioner a number of detailed tables highlighting the various items of correspondence with different departments, as well as some samples of the actual correspondence received. Some of this correspondence is likely to have been legitimate and some of it post-dates the council's internal review. However, the Commissioner was satisfied that even if correspondence of that nature was disregarded, it was still readily apparent that the complainant had submitted a substantial amount of correspondence on a regular basis. The Commissioner also notes that given the nature of the issues concerned, much of the correspondence would involve subject access issues under the DPA. While subject access requests cannot be deemed vexatious in their own right under the DPA, the Commissioner considered that it was important to take them into account as part of the overall pattern of obsessive behaviour being demonstrated by the complainant. To disregard this correspondence would give an artificial impression of the overall pattern of correspondence and the complainant's on-going behaviour. It was also apparent that other factors as described above also contributed to the conclusion that the requests had become obsessive.

37. As mentioned, the Commissioner accepts that some of the correspondence would have been legitimate, particularly bearing in mind the complainant's authority to act on behalf of this wife. Sometimes, requesters will be justified in their persistence because of the particular background circumstances. However, overall, the Commissioner was left with the impression that the complainant had pursued his grievances to a disproportionate extent and to suggest that all of the correspondence was justified purely because he was acting on behalf of his wife was not a persuasive position for the complainant to adopt in the Commissioner's view. The Commissioner understands that the council has attempted to assist the complainant and provided detailed responses and information to him however there does not appear to be any amount of information that would be likely to satisfy the complainant. The complainant had also made no demonstrable attempt to modify his behaviour. The complainant seems determined to pursue any avenue of complaint available as described above which is a further sign of the obsessiveness of the complainant's approach to these issues.

Did the requests have the effect of harassing the council?

38. The Commissioner would like to highlight that this element of the criteria is concerned with the effect of the request on any reasonable public authority, rather than what the complainant's intention was. It is not uncommon in relation to vexatious requests for the requester to have a genuine conviction that the request was a reasonable one.
39. The Commissioner has already noted above that the council has had to deal with a very large amount of communication from the complainant over the period in question and the council argued that this, together with the frequency and nature of that communication, had the effect of harassing its staff. This was particularly the case in view of the fact that the council considers that the complaint had exhausted its complaints process and pursued various third party avenues, adding to the overall burden on the council.
40. The council also highlighted that the complainant's requests for information are often mingled with accusations and complaints about individual members of staff at the council, which had increased the harassing and personal impact of the correspondence. The council said this was demonstrated by the legal actions pursued by the complainant in the county court against senior members of the council's staff. The council also said that the style of the complainant's correspondence can often appear hostile and argumentative. The council said this is characterised by the use of bold, italics and excessively large font to emphasise points. The council provided the Commissioner with some evidence of this. As mentioned, the council told the Commissioner that the complainant's correspondence often seeks to challenge decisions made through his requests. The Commissioner notes that some of the requests forming the subject of this complaint provide examples of this when the complainant subjectively frames his requests by referring to the council's threatening and harassing behaviour and seeks to challenge invoices relating to his wife's care.
41. Overall, the Commissioner found that the volume, frequency and nature of the complainant's correspondence with the council would have had the effect of harassing the council's staff. The Commissioner considers that it would be reasonable for the council's staff to regard further requests and correspondence on the same topic from the complainant as harassing when the complainant had exhausted the council's internal complaints process and pursued external remedies, involving complaints about individual staff members. Furthermore, there was every indication that responding would only lead to further requests, enquiries and complaints given the nature of previous engagement.

Would the requests impose a significant burden?

42. The council said that the cumulative effect of responding to the requests, taking into account the amount of time already spent on previous requests and dealing with other related matters such as complaints to the county court, represented a significant burden to the county council in terms of officer time. The council said that the complainant's correspondence had diverted staff away from their core duties. The council pointed about the core function of many of the staff involved was to care for vulnerable adults and the volume of correspondence received by the complainant had reached a stage where the council had genuine concerns about the detrimental impact to other members of the public using its services. The council stressed that in its view, responding to the requests would not be the best use of public resources.
43. The Commissioner considers that compliance with the requests would impose a significant burden when their complete context is taken into account. It is clear to the Commissioner that the complainant's request and correspondence since 2011 would have imposed a substantial burden on public resources, which has clearly escalated progressively since that time, with little prospect of the issues being resolved to the satisfaction of the complainant.

Are the requests designed to cause disruption or annoyance?

44. The Commissioner considers that this part of the vexatious criteria is difficult to prove because it requires objective evidence that it was the complainant's intention to cause disruption or annoyance. The council conceded that it has no evidence to prove that the requests were specifically designed to cause disruption or annoyance.

Did the requests have any serious purpose or value?

45. As already highlighted by the Commissioner, it is likely to be the case that some of the complainant's correspondence with the council was for legitimate purposes. However, the council again highlighted comments made by the Upper Tribunal in the case of *Dransfield* as follows:

"...a series of requests may suggest that later requests have become disproportionate to whatever the original enquiry was".

46. Given how the issues have progressed over a long period of time, the Commissioner agrees with the council that any serious purpose or value the requests may have by this stage is substantially reduced. In other words, the vexatious quality of the requests outweighs any serious purpose or value in the council continuing to engage with this chain of correspondence.

Were the requests vexatious overall?

47. Taking into account all the circumstances of the case, the Commissioner considers that a strong case had been presented to demonstrate that the requests were vexatious. It was not the intention of the legislation that individuals should be allowed to pursue personal grievances to an unreasonable extent or that limited public resources should be spent in continuous unproductive exchanges, at the expense of the other valuable services provided by local authorities. The FOIA gives members of the public unprecedented access to recorded information held by public authorities and it is important that those rights are exercised in a responsible and proportionate way. While the Commissioner considers that the complainant may have begun seeking information for a serious purpose, there comes a point when the action being taken and the associated burden being imposed on the authority is disproportionate to whatever objective the complainant is attempting to achieve. That point has been reached in this case.

Right of appeal

48. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)
GRC & GRP Tribunals,
PO Box 9300,
LEICESTER,
LE1 8DJ

Tel: 0300 1234504

Fax: 0116 249 4253

Email: informationtribunal@hmcts.gsi.gov.uk

Website: www.justice.gov.uk/guidance/courts-and-tribunals/tribunals/information-rights/index.htm

49. If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.
50. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed

Andrew White
Group Manager
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Annex A – requests

Request 1: reference 1545

"...I ask, as a Freedom of Information request under refer 12.08.21 that you advise

- A. The authority you rely upon to (a) threaten me with and (b) to issue proceedings in my name in these matter*
- B. Confirmation that (a) the Financial assessment is valid (b) that it was computed fully in accordance with CRAG (2012) (c) that [name of complainant's wife]'s indebtedness and contractual obligations have been taken into Account and (d) that all invoices so far raised are in conformity with CRAG (2012) guidelines".*

Request 2: reference 1546

"I am sorry to bother you on this but I recall an interchange with one of you in which I sought to determine whether a copy of my LPOA for Health and Welfare received by a third party, emanated from the Council.

I recall I was assured that no such copy had been supplied to a third party (and that you would wish to know if such action had happened...)

May I ask, for the record, a copy of all related correspondence (and assurance that no such copy was subsequently provided), please?"

Follow up request

"I note that I have not received a reply to this.

If this is a result of a formal, deliberate refusal to respond to any communication with me I believe that advice of such a decision was warranted (a) as a normal simple courtesy and (b) as a requirement of your public duty.

If this is the case I ask that you do so confirm and, as a Freedom of Information request (ref. 12.08.21.1), advise the authority for such refusal".

Request 3: reference 1547

"I write with reference to [name's] letter of 22nd August 2012 and ask that in accordance with the Freedom of Information Act you provide the following information:

- 1. A copy of the relevant Financial Assessment*

Confirmation that

- 2. you are required to have provided this Assessment under CARG 2012*
- 3. you have not done so*
- 4. There is/is not any impediment or reason why this may not be provided*

by return

5. *You have advised that you are "liaising with my colleague in legal regarding the property in Trust and how this should be considered within the financial assessment"*
6. *this information is relevant to the determination of the financial assessment*
7. *No communication to date with regard to the financial assessment or invoices raised was based on the results of such liaison*
8. *You have not advised the results of such liaison*
9. *The results of such liaison do/do not alter the financial assessment and, if so, in what manner*
10. *Any financial responsibility for settlement of the said invoices devolves to the Addressee of the invoices*
11. *ESCC have stated "As you manage [name of complainant's wife]'s funds you are responsible for ensuring that these invoices are paid" the legal basis for this responsibility to "ensure that these invoices are paid"*
12. *The legal basis/authority upon which you consider that I in my own name, are responsible for payment of the said invoices*
13. *The legal basis/ authority upon which you consider that I, in my own name, should be sued for payment for the said invoices*
14. *Outstanding debts owed by the subject of the financial assessment are/are not taken into account within the financial assessment*
15. *Existing contractual obligations to make payment by the subject of the financial assessment are/are not taken into account within the financial assessment"*

Request 4: reference 1548

"I write further in reference to [name]'s letter of 22nd August 2012 and ask that in accordance with the Freedom of Information Act you provide the following information:

16. *Does ESCC consider that [name of complainant's wife] jointly owned property is capable of being sold at this time*
17. *Does ESCC consider that [name of complainant's wife] is capable of re-assigning the beneficial interest in jointly owned property to somebody else at this time"*

Request 5: reference 1551

"I write under my LPOA in respect of my Wife, [name] (also known to you as [name]) to ask that you provide the following information.

1. *Has the Council provided any of my Wife's 'sensitive personal data' to a third party?*

If so

- a. Under (1) what circumstances (2) for what purpose (3) to whom what and on which date(s)
 - b. The authority relied upon for permission for the provision of such data
 - c. I ask that you provide copies of all associated correspondence
 - d. The identity of all persons involved in and/or responsible for the provision of such data
2. Has the Council previously received correspondence relating to the possible provision of such 'sensitive personal data' to a third party and, if so
- a. What (on each occasion) was the Council's response and for this I ask for copies of all associated correspondence
 - b. Is the provision of such data contrary to Council Policy – if so, please provide full details of such Policy
 - c. What would be the Council's response to the provision of any such data
 - d. Would the provision of such data constitute a disciplinary offence and, if so, what would be the range of any resulting sanctions?"

Request 6 – reference 1562

"Re [name of complainant's wife]

I note the invoices to which you refer (per line item)

'(date) I week of DPS – RESIDENTIAL – RESPITE (Mount Denys) £580.00
£114.75'

May I ask, by way of an information request that you provide

1. The relationship between £580 and £114.75

The meaning of (in this context)

2. DPA
3. RESPITE

And

4. What alternative reasons may such invoices be established other than for RESPITE
5. The justification/applicability in this case for the use of RESPITE"

Request 7 – reference 1583

"I note that you continue to harass me by continuing to issue Invoices in my name.

I believe I have no obligation to you whatsoever and therefore ask, as Freedom of Information Act request

1. The reason/justification you rely upon for issuing such Invoices in my name
2. What authority, if any, you believe I hold in respect of your named client '[name]'".

Request 8 – reference 1595

"I refer to the Council's relevant published Complaints Policy (Operational Instructions – Adult Social Care) with particular reference to Section 7 i.e. 'For complaints received directly by the team, it is the manager's responsibility to ensure that the complaint is acknowledged, in writing, within three working days of receipt' et al and ask (from your recorded information) that you provide for each Complaint I have submitted to Adult Social Services

- 1. The date of receipt*
- 2. The date of the relevant 'acknowledgment letter' (as described in Section 7) and its manner of delivery*
- 3. A copy of the 'acknowledgement letter'*
- 4. The date and manner of delivery of the formal response*
- 5. A copy of the formal response".*

Request 9 – reference 1607

"Please provide separately in respect of all investigations carried out under the Sussex Multi-Agency Policy and Procedure for Safeguarding Adults at Risk for versions 1 and 2 the number of cases determined as

- (a) Substantiated*
- (b) Unsubstantiated*
- (c) Inconclusive*

I would ask that the information be provide if possible in a Word format letter sent via email".

Request 10 – reference 1696

"This is a request under the Freedom of Information Act

I ask that you please supply me with all directly and any associated information relating to the following matters

I ask that you include copies of material which you hold in the form of paper and electronic records including emails. I would also ask that you supply all information in hard copy form.

- 1. Under the authority of my LPOA I issued a Subject Access Request in respect of my wife, [name] – please confirm the*
 - a. date upon which the valid request was received*
 - b. latest date by which a response was required in accordance with the appropriate statute*
 - c. date the request was answered*
- 2. I have a number of times requested the following information, please for each request, provide the following*

- a. the date the request was received*
- b. the latest date by which a response was required in accordance with section 10 of the Freedom of Information Act*
- c. the date the request was answered*

In this, I refer to

- i. requests for a copy of the relevant Financial Assessment*
 - ii. the authority relied upon to invoice me personally in respect of Care Home costs*
 - iii. the Authority relied upon to advise that recovery proceedings (in regard to ii) would be commenced against me*
 - iv. the authority relied upon to consider that I held authority in respect of [name of complainant's wife] (as indicate in the invoices mentioned at ii)*
- 3. It is evident that the council is now operating a total ban on any and all forms of correspondence with me. I therefore ask that you provide copies of all internal communications and instructions relating to this".*