



The Law Society

Adjudication

Law Society Freedom of Information Code
July 2015



Adjudication in a matter raised by YZ

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31 July 2015

AN ADJUDICATION IN A MATTER RAISED BY YZ.

The decision is currently published without its attached schedule of documents. The Solicitors Regulation Authority (SRA) is currently considering pursuant to paragraph 17 of its FOI Code whether to accept the Adjudicator's decision.

1. THE ISSUE

1. Whether the Law Society ("the Society") acted appropriately in accordance with its Freedom of Information Code ("the Code") when responding to YZ's ("the Applicant") request for information concerning certain interactions between the Solicitors Regulatory Authority's ("the SRA") and a named Charity and/or Company.

2. BACKGROUND

2. The Applicant's information request arises from the activities of a particular solicitor and it concerns the SRA's interaction with his employer.
3. It is a matter of public record that the individual solicitor in question ("AB") is a controversial figure and is one who has attracted some coverage in national media in consequence of his activities.
4. It is also a matter of public record that the Society has now released into the public domain certain limited information regarding closed SRA investigations in respect of AB.
5. AB practises as an employed solicitor for a small charity ("the Charity"), of which he is a founder, trustee and director.
6. The SRA is responsible for regulating employed solicitors in AB's position. Consequently, and in common with all practising solicitors, AB has a unique identifying reference number ("SRA number") allocated to him by the SRA.

7. I understand that where an individual is an employed solicitor, the SRA will also allocate an SRA number to that individual solicitor's employer. It will do this even where the employer itself is not an entity which is regulated by the SRA. The Society states that this SRA number assists the SRA's administrative operations in relating and cross-referencing the details of a regulated individual to their non-regulated employer. Therefore, in these cases, the existence of an SRA number is not indicative of the SRA considering that it has any regulatory functions or powers over such entities.
8. In the present case, although the SRA allocated an SRA number to the Charity it does not have any regulatory or oversight functions in relation to it; such functions are the responsibility of the Charity Commission.
9. AB operated (and presumably continues to operate) a company ("the Company") which is described on its letterhead as "*the in-house legal operations department*" of the Charity. The Company is not regulated by the SRA and the SRA has not allocated a separate SRA number to the Company.
10. AB's activities have, over a period of time, caused a number of third parties to correspond with both the SRA and the Society. The Applicant in this case is one such individual. Also relevant to the Applicant's information request in this case is the correspondence and earlier information request of a third party, referred to here as "H". I am told by the Applicant that there is no connection between him and H, other than a shared interest regarding the activities of AB, the Charity and the Company, and the SRA's response to such concerns as have been raised.
11. In emails to H of 2 and 23 December 2014, the Society refused to give details of any complaints against AB, but said that the SRA had received nine allegations relating to the Charity. It confirmed that six of those nine matters had been investigated by the SRA and were now closed. In both emails the Society drew a distinction between complaints relating to the individual solicitor and complaints relating to the Charity.

3. THE REQUEST AND RESPONSE

3.1 The Request

12. On 18 February 2015 the Applicant asked the Society a number of questions arising from its responses to the freedom of information requests made by H.
13. Those questions related to the investigations which the Society had said the SRA carried out into the Charity and they were limited to the six matters which the Society had described as “closed” when responding to H (“the closed files”). The Applicant stated in terms that he was not asking for details of any investigations which were ongoing.
14. On 10 March 2015 the Society replied to the Applicant, providing a table which set out in summary certain details of the six closed files. This prompted the Applicant to make further requests in an email of 12 March 2015. It is the questions in that email which are the subject of this adjudication.
15. The Applicant's request of 12 March 2015 consisted of a number of points. For the purposes of this adjudication, it is parts (3) and (4) of that request which are the relevant parts. However, for reasons of providing context, it is also helpful to set out part 2(a) of the Applicant's request, which was worded as follows:

“2. (a) Why did the SRA carry out at least nine investigations into [the Charity] (six of which are closed) without informing the relevant regulator (the Charity Commission) of (i) any of the underlying complaints against [the Charity] or (ii) the fact that the SRA was carrying out investigations into an entity regulated by the Charity Commission?”

16. Parts (3) and (4) of the Applicant's request, which are the subject of this adjudication, read as follows:

“3...please send me a copy of all correspondence which passed between the SRA and [the Charity] (or its alter ego, [the Company] which is said to be a trading name of [the Charity]) in respect of all the matters referred to in the attachment to your email.”

“4. Please send me a copy of the investigation report(s) to which you refer in your email dated 10 March 2015...I have no objection to

your redacting the names of any individuals other than directors / trustees of [the Charity]”

17. With regard to part (3), the attachment it referred to was the table setting out in summary certain details of the six closed files which had previously been dealt with by the SRA.
18. When making this request the Applicant set out in detail why he considered the Society should release the information he sought at part (3) of his request. He repeated these points in support of his contention that the information covered by part (4) of his request should also be disclosed to him.
19. Amongst other points, the Applicant said there was a clear public interest in establishing why and how the SRA had (as he understood it) investigated a charity which it did not regulate and which it had no power or authority to investigate. He said there was a public interest in establishing why the SRA did not tell the Charity Commission about its investigations or about any underlying allegations of misconduct. He also felt that there was a public interest in establishing why the SRA did not send the Charity Commission a copy of its *“resulting investigation reports”*. The Applicant also considered that there was a clear public interest in considering whether the SRA had been acting within its powers.

3.2 The Society’s Response

20. The Society responded substantively to the Applicant’s request on 2 April 2015. It addressed all the elements of the Applicant’s request, including the two parts which are the subject of this adjudication; it refused to disclose the information sought at parts (3) and (4) of the request.
21. That refusal was based on the Society’s assertion that, contrary to the statements it had previously made, the six closed files related to AB in person and not the Charity. Accordingly, it now relied on paragraphs 14.5 and 16 of the Code to withhold that information.

22. This appeared to specifically contradict the earlier information the Society had provided to H. When responding to H, the Society had told him that the SRA held six closed investigation files relating to the Charity. However, on 2 April 2015, the Society now stated, in reply to part (2)(a) of the Applicant's request that:

"The SRA did not conduct investigations into [the Charity]. The SRA's investigations have been into [AB], who is a regulated individual, not [the Charity]. The information previously supplied was in respect of reports made to the SRA as misconduct complaints against [AB]."

To clarify the answer in my email of 10 March 2015, there is no formal investigation report to release to the Charities Commission as the SRA does not regulate [the Charity] and therefore has no powers to investigate the entity for the purposes of the SRA Accounts Rules. However I can confirm that a representative of the SRA has previously spoken to a representative of the Charities Commission during which time it was confirmed that the Charities Commission are aware of the media reports raising concerns about [the Charity]".

23. Specifically, with regard to part (3) of the Applicant's request, the Society said:

"The SRA's communications have been with [AB], who is a regulated individual, not with [the Charity]."

This information is therefore being withheld under section 14.5 of the Code. This section states that the Society does not have to release information about specific investigations, disciplinary cases or applications arising from its regulatory role. In applying this exception the Society is further required to carry out a 'public interest test' in relation to the regulatory information requested. This is because 14.5 of the Code is a 'qualified exception' requiring the application of a public interest test in determining whether the information should be released.

Where we apply the public interest test, the public interest factors in favour of publication must be outweighed by the interests protected by the exception. The contents of the requested correspondence in this case relate to a specific SRA matter.

Disclosure of the requested correspondence would mean the information and the individuals to whom it relates may be identifiable. It is therefore our view that the public interest in withholding the requested information outweighs the public interest in disclosing it."

24. In relation to part (4) of the Applicant's request, the Society said:

“The SRA did not conduct investigations into [the Charity]. The SRA’s investigations have been into [AB], who is a regulated individual, not [the Charity] and therefore there is no formal investigation report regarding [the Charity].

In respect of the misconduct reports considered by the SRA, this information is being withheld under section 16 of the Code. This section states that we must not disclose personal data if in doing so we would be in breach of the Data Protection Act. The investigation reports¹ contain personal data, the disclosure of which would be likely to constitute a breach of the Data Protection Act. In arriving at this conclusion I have taken into consideration the fact that it would be impossible to redact the reports to such an extent as to render the identities of the informants and others anonymous.

Additionally, the SRA receives information from informants on terms that do not permit it to use the information for an unconnected purpose.”

3.3 The Applicant’s Reply

25. The Applicant did not accept the Society’s response, and he replied in detail in an email of 3 April 2015. He said that he could not reconcile the Society’s response with the information which it had previously given, specifically that the six closed files related to the Charity and not AB. He noted that the Society’s correspondence with H had drawn a clear distinction between complaints against AB and complaints against the Charity.
26. The Applicant further noted that the Society had sent him the table containing certain details of the six closed files but in its email of 2 April 2015 it had then told him that that, contrary to earlier statements, the SRA had never investigated the Charity, saying that at all times it had in fact been investigating AB.
27. The Applicant said that:

¹ As I note in the course of this adjudication, the Society’s interchangeable use of the terms “misconduct reports” and “investigation reports” when referring to the same material has led to understandable and avoidable confusion.

“An impartial observer could be forgiven for thinking that this bears the regrettable hallmarks of an eleventh-hour attempt at (i) bringing the Society into a position in which it can belatedly seek to invoke paragraphs 14.5 and 16 of the Code of Practice and (ii) avoiding any difficult questions about whether the SRA has inadvertently been investigating complaints about an entity...over which it has no regulatory jurisdiction. It goes without saying that, if paragraphs 14.5 and 16 were applicable, the Society would not have released the information about the [Charity] complaints in the first place...”

28. The Applicant also took issue with the way in which the Society had applied the public interest test and stated that the Society had *“confused two separate issues: the public interest test and personal data”*. In his view, *“Paragraph 16 of the Code is not relevant to [the Charity], because [the Charity] is not a living individual. To the extent that the requested material includes personal data relating to living individuals, those data can very easily be redacted.”*
29. The Applicant concluded that if the Society wished to maintain its new position as set out in its email of 2 April 2015, the matter would *“have to proceed to an adjudication, at which the Adjudicator will need to examine the entirety of the Society's and the SRA's relevant files and correspondence ...”*
30. The Applicant subsequently confirmed to the Society that he wished his request to be referred for adjudication.

4. REFERRAL FOR ADJUDICATION

4.1 The Withheld Information

31. On 6 April 2015, the matter was referred to me for adjudication. At that point, the Society provided me with the correspondence it had exchanged with the Applicant in relation to his request.
32. On 13 April 2015, I wrote to both the Society and the Applicant and invited them to make submissions in support of their respective cases. At the same time, I asked the Society to provide me with the withheld information. The Society duly provided me with what it considered to be the withheld information, including material that it referred to as the reports.

33. At the Applicant's request, the Society also provided me with a paginated bundle of papers containing the correspondence relating to a number of earlier information requests, most of which had been made to the Society by H. Included in that bundle of material was the Society's response to H in which it had stated that the six closed files it held related to the Charity.
34. On reviewing this material, it was evident to me that the information initially provided by the Society was insufficient for me to undertake my adjudication. There were two reasons for this:
- i. The correspondence was evidently incomplete: there were gaps. Without sight of that information it was not possible for me to reach a conclusion as to whether the withheld information consisted *entirely* of correspondence between the SRA and AB (as the Society now said) or whether it included correspondence between the SRA and the Charity and/or Company in its own right.
 - ii. The only "reports" provided to me by the Society consisted of the complaints made by various individuals to the SRA. The Society referred to these as "*investigation reports*".² It was evident to me that this description had generated some confusion. On a plain reading of the Applicant's request, it was clear that he was seeking any reports in relation to the closed files which were prepared by the SRA following its investigation in those matters³. What the Society provided to me at this point were complaints.
35. When referring the matter to me, the Society maintained that no other reports were held. I found this response surprising and I sought clarification. I was aware (and the Applicant also pointed out) that the SRA was in the general practice of compiling a "Risk Assessment Profile" ("RAP") in relation to its investigations. Such RAPs, in my view, were likely to fall within the description of a report for the purposes of the Applicant's request.

² It also used the term "*misconduct reports*" in its correspondence to the Applicant of 12 March 2015.

³ The Applicant has confirmed that this was, indeed, the information he sought and expected to be held.

36. It also seemed to me that a body such as the SRA would be likely to routinely prepare some form of document, however brief, prior to closing an investigation which may reasonably be regarded as falling within the broad description of a “report”.
37. Consequently, I considered that it would be necessary to review the complete contents of the six closed files and I asked the Society to make them available. On 26 May 2015 the Society provided me with a complete copy of each of the files, in electronic format. When doing so, and in response to my specific request, the Society’s Compliance Manager, Mr Bob Stanley, provided me with unambiguous written confirmation that the information provided to me comprised all of the information held by both the Society and the SRA in relation to the six closed files. I find no reason to doubt Mr Stanley’s statement in this regard.

4.2 The Society’s submissions

38. When inviting the Society to make submissions, I asked it to address what appeared to be the evident contradiction between the information it had previously provided to H and the response it had given to the Applicant on 2 April 2015. Specifically, I asked the Society to confirm whether the SRA’s focus did in fact change from investigating the Charity to investigating AB and, if so, when and why this occurred.
39. In response, Mr Stanley made the following submissions:

“In response to point 5 of [H’s] request (FOI/BS/1323) on 23 December 2014 I stated the following (page 64 of bundle):

“There was an investigation matter for each of the nine allegations against the organisation – three open and six closed.”

In response to points 1, 2 and 3 of [H’s] request (FOI/BS/1322) on 2 December 2014 I stated the following (page 69 of bundle):

“With regards to the [Charity], the Solicitors Regulation Authority (‘SRA’) have a record of 9 matters.”

“The earliest allegation the SRA have recorded against the [Charity] is dated 30 August 2011.”

“There was an investigation matter for each of the nine allegations against the [Charity].”

My statements in response to [H’s] requests (above) do appear to suggest that the SRA was investigating [the Charity] and I apologise for giving that misleading impression.

The reports were opened on the SRA system against [the Charity] which [AB] had recorded as his employer. This is in line with standard SRA procedure on its systems to link reports against individuals with their employers. In this case the employer [the Charity] is not regulated by the SRA so there has been no investigation by the SRA into that organisation. The SRA’s focus has never changed from an investigation or investigations into [the Charity] to an investigation or investigations into [AB]. The SRA’s focus has only been on investigating [AB]. It does not have the powers to regulate [the Charity].”

40. I also asked the Society to confirm if it was relying, to any extent, on paragraph 16 of the Code to withhold the information falling within part (3) of the Applicant’s request. The Society’s response was as follows:

“The correspondence between the SRA and [AB] is being withheld under Clause 14.5 and Clause 16 of the Code.

Clause 14.5

This clause states that the Society does not have to release information about specific investigations, disciplinary cases or applications arising from its regulatory role. In applying this exception the Society is further required to carry out a ‘public interest test’ in relation to the regulatory information requested. This is because 14.5 of the Code is a ‘qualified exception’ requiring the application of a public interest test in determining whether the information should be released.

Where the Society applies the public interest test, the public interest factors in favour of publication must be outweighed by the interests protected by the exception. The contents of the requested correspondence in this case relate to specific SRA matters.

Disclosure of the requested correspondence would mean the information and the individuals to whom it relates may be identifiable. It is therefore the Society’s

view that the public interest in withholding the requested information outweighs the public interest in disclosing it.

Although the matters created by the reports are now shown as "closed" matters on the SRA system, the correspondence relates to ongoing matters of allegations against [AB] that have not been upheld. The SRA publishes decisions against regulated firms and individuals on its website but it cannot be in the public interest to publish allegations that have not been upheld.

The SRA is working to strict timescales to resolve the ongoing matters relating to [AB] and would consider disclosure at some future date when these matters have been resolved.

For these reasons the entirety of the correspondence between the SRA and [AB] is being withheld under clause 14.5 of the Code.

Clause 16

Some of the information in the correspondence is personal data relating to [AB] and that is also being withheld under clause 16 of the Code. The SRA publishes upheld decisions against regulated individuals but in the Society's view it would be a breach of [AB] rights under the Data Protection Act to publish his personal data into the public domain.

Again, The SRA is working to strict timescales to resolve the ongoing matters relating to [AB] and would consider disclosure at some future date when these matters have been resolved."

41. The Society also made the following submissions in relation to what it referred to as the "misconduct reports"⁴:

"In respect of the misconduct reports considered by the SRA, this information is being withheld under clause 16 of the Code. This clause states that we must not disclose personal data if in doing so we would be in breach of the Data Protection Act. The investigation reports contain personal data, the disclosure of which would be likely to constitute a breach of the Data Protection Act. In arriving at this conclusion the Society has taken into consideration the fact that It would be impossible to redact the reports to such an extent as to render the identities of the informants and others anonymous. Even if the reports were heavily redacted it would be clear to the Applicant and others that they related to [AB]. The Society considers that it would be a breach of [AB's] rights under the Data Protection Act to publish his personal data into the public domain."

42. The Society did not advance any further argument by specific reference to the contents of the information it held. Nor did it address the scope of the Applicant's request.

⁴ These were the reports of alleged misconduct made to the SRA by various third parties.

43. When originally providing me with what it said was the withheld information, the Society also provided some brief submissions to me on a closed basis. As I explained to the Applicant in correspondence, these submissions did not go to the contents of the closed files themselves. Instead, they served to update me, in very general terms, as to the position regarding the open matters still with the SRA. I considered it appropriate to receive these submissions because such information could potentially inform any public interest balancing exercise I may be required to undertake. I directed that these submissions should remain closed because disclosure into the public domain could potentially prejudice an ongoing investigation.

4.2 The Applicant's submissions

44. The Applicant made various detailed written submissions to me during the course of my investigation, both formally and in the course of correspondence. Those submissions were wide ranging and covered not only the specific subject matter of his request, but also the wider adjudication process itself. This included a set of proposed draft rules for the adjudication process which he considered I might wish to adopt in future cases. The Applicant also referred me to a number of previous adjudications made by my predecessor and he invited me to read them.

45. Whilst I do not specifically refer to each and every point raised by the Applicant in his submissions and correspondence in this adjudication, I have carefully read and considered in detail all of those submissions and all of the points he makes. I have also read the past adjudications he has referred me to.

46. Likewise, I have read and carefully considered the Applicant's thoughtful submissions regarding the adjudication process itself. Although it is not appropriate to deal specifically with those matters in this adjudication, I would wish the Applicant to be aware that I will carefully consider how best to take account of the points he has raised in future adjudications.

47. In his submissions of 17 April 2015, the Applicant summarised his position to me as follows:

- I. The SRA has no regulatory jurisdiction over the Charity because it is a charity (not a law firm). Despite that, the Society stated in very clear terms that the SRA had opened nine investigations in respect of the Charity, six of which were closed. Paragraph 14.5, which relates to specific investigations arising out of the SRA's regulatory role, has no application to these investigations. Having realised that this meant that the relevant correspondence with the Charity (and the SRA's relevant reports) would have to be disclosed, the Society attempted to change its position, asserting that the investigations were into AB and not the Charity. In the Applicant's view, this had all the signs of a tactical manoeuvre, aimed at allowing the Society to invoke paragraphs 14.5 and 16 of the Code
- II. Paragraph 14.5 of the Code does not cover investigations which are no longer continuing.
- III. Paragraph 14.5 of the Code imports a prejudice test. The Applicant argued that no investigation would be prejudiced because the investigations in question are closed. He noted that no evidence of prejudice had been put forward by the Society.
- IV. Even if paragraph 14.5 of the Code was engaged, the Applicant said that the public interest would be overwhelmingly in favour of disclosure. In his view, the Society's email of 2 April 2015 demonstrated a continued failure to apply the public interest test properly.
- V. Paragraph 16 of the Code had no application to the Charity because it is not a living individual. The Applicant said that any personal data could be redacted and he considered that the Society's assertion that redaction was "*impossible*" is convenient (from the Society's point of view) but not credible.

- VI. The Society's email of 2 April 2015 contained an "*unexplained volte face*", and displayed both a lack of rigour in applying the strict wording of the Code and a failure to correctly apply the public interest test.
- VII. The Society should have no objection to the Adjudicator addressing its reliance on paragraph 16 of the Code and reviewing the withheld information to take a view on the possibility of redaction.
- VIII. The Applicant stated that he considered the Code was deficient in important respects and would now benefit from significant revision.
- IX. The Applicant also considered that a transparent procedure should be put in place for adjudications under the Code.
48. These last two points are not matters for this adjudication.
49. In his "*Supplemental Submissions*" to me of 28 April 2015, the Applicant made a number of further points. He said he considered this necessary because the Society's submissions of 27 April 2015 had included statements which it had not previously made to him in correspondence.
50. In the Society's submissions of 27 April 2015, Mr Stanley had said "*My statements in response to [H's] requests do appear to suggest that the SRA was investigating [the Charity] and I apologise for giving that misleading impression.*"
51. The Applicant's response to this was that:
- "The statements did not merely "appear to suggest" or "give the impression" that the SRA had investigated [the Charity] - they stated in terms that that was the case. A clear distinction was drawn by the Society between [the Charity] and [AB]. If the statements were mistaken, it is not clear how such a serious mistake came to be made or why the Society could not have confessed to it prior to filing its submissions."*

52. The Applicant also took issue with the Society's explanation for the SRA files being opened in the name of the Charity and not AB as the regulated individual. He said that explanation was *"not consistent"* with the statements already made by the Society in correspondence and his own analysis of the position. He said:

"No explanation is given of why the SRA would record complaints against (or link complaints to) the name of an entity which it does not regulate (unless it is investigating that entity). No evidence has been put forward to demonstrate any relevant standard procedure on the part of the SRA.

The fact that the SRA does not have "the powers to regulate" [the Charity] does not mean that the SRA has not in fact been investigating [it]. Those investigations may have been carried out without any (or any adequate) consideration being given to whether the SRA had power to do so or whether it should inform the Charity Commission. Indeed, it is apparent...that the SRA did not think to liaise with the Charity Commission.

The Society's correspondence...says very clearly that the SRA investigated [the Charity]. The fact that the relevant files were in the name of [the Charity] confirms this. Against such a background, it is (with respect) not credible to assert that the SRA has never investigated [the Charity].

53. By way of footnote to this, the Applicant added:

Given that [AB] is the "Director General" of [the Charity], through which he offers legal services to the public, it would require a willing suspension of disbelief to accept that the SRA investigated [AB] without also looking into [the Charity].

54. The Society's submissions of 27 April 2015 had also stated that *"Although the matters...are now shown as 'closed' matters on the SRA system, the correspondence relates to ongoing matters of allegations against [AB] that have not been upheld. The SRA publishes decisions against regulated firms and individuals on its website but it cannot be in the public interest to publish allegations that have not been upheld."*

55. In response to this the Applicant questioned what he described as *"a second remarkable volte face on the part of the Society"*. He said that:

“The SRA would not mark a matter as closed if it were open...”

“Both the Society and the SRA know the difference between “closed” and “open”...It is conceivable that, since the closure of the six matters, new allegations similar to those made in the six matters have been received...that ...would not mean that the closed matters are not closed: it would mean simply that there are some open matters which involve allegations like those which arose in the closed matters.

56. The Applicant noted that the table which had previously been publically disclosed by the Society, if its current stance was correct, appeared to have disclosed AB’s personal information.
57. On 15 May 2015 the Applicant made further submissions, entitled “*Note to the Adjudicator on Inspection of Files*”. In those submissions, the Applicant set out in clear terms the scope of his request as he saw it. He wrote:

“Misconduct reports

...A interpreted the Society’s expression “investigation report” to mean a report prepared by the SRA (rather than an allegation or complaint reported to the SRA by a third party). So, A requested “a copy of the investigation report(s) referred to in your email dated 10 March 2015”. (Adjudicator’s emphasis)

... A’s request was not limited to “formal” reports...

A’s request is thus for a copy of any reports (whether formal or otherwise) of the investigations which the SRA carried out into the closed matters shown in the table. If the SRA prepared no reports of any kind on its investigations into the six closed matters, the Society should (i) confirm that and (ii) explain why it included the word “formal” in its email dated 2 April 2015.

Correspondence between the SRA and the named individual

A’s request is not for “correspondence between the SRA and the named individual [AB]”. A’s request is for correspondence between the SRA and [the Charity]. This includes (i) correspondence between the SRA and [the Charity], (ii) correspondence between the SRA and those acting in their capacities as directors/trustees of [the Charity] and (iii) correspondence between the SRA and [the Company] (which, as explained below, is a trading name of [the Charity]).

...It may be the case that some or all of the relevant files contain a mixture of material - some of it relating to [the Charity or Company],

some of it relating to [AB] (as an individual, rather than qua director/trustee of [the Charity/Company]) and some of it relating to both [the Charity/the Company and AB] (as an individual). Each document within each file needs to be considered individually in order to determine whether it must be disclosed (whether with or without redactions). It is only material which clearly relates to [AB] in his capacity as an individual solicitor...and which amounts to personal data within the meaning of the DPA which can be withheld.
(Adjudicator's emphasis)

5. ADJUDICATION

5.1 Preliminary Observations

58. By way of preliminary observation, and in keeping with the practice of the Information Rights Tribunal, I consider the role of Freedom of Information Adjudicator to be an inquisitorial one. This is so because a requestor will inevitably come to the adjudication process without the benefit of seeing the information they are seeking. As such, they are necessarily limited in the arguments that they can make in favour of disclosure. Accordingly, the Code provides that it is the Society's task to persuade me that requested information should be withheld (see paragraph 18 of the Code): it is not the Applicant's task to persuade me that it should be disclosed.
59. In this process I do, of course, invite submissions from an Applicant and I have due regard to any arguments they may wish to raise. In the present case, given the evident time and trouble which the Applicant has taken in order to present his submissions, I consider it appropriate to address aspects of those submissions in some detail below.
60. Also in keeping with this inquisitorial role, I regard it as incumbent on the adjudicator not only to receive the Society's arguments but, where necessary, to interrogate the withheld information itself.
61. In the present case, due to history of the matter, I have been at particular pains to adopt such an inquisitorial approach. I have taken steps to satisfy myself that I have had access to all of the information potentially falling within the scope of the Applicant's request. As well as giving due consideration to

the submissions of the parties, I have carefully read all of the withheld information itself in order to decide whether, (a) the information provided to me is within the scope of the Applicant's request; and (b) if it is, whether it engages either of the exemptions claimed by the Society.

62. In so far as relevant, I have also considered whether or not the arguments advanced by the Society in relation to the public interest test are made out.
63. However - and this is of crucial importance – the Code is about the right of access to recorded information which is *actually* held by the Society. Consequently, my role is not to determine what information *should be held* by the Society in a given matter, or to investigate the Society's administrative procedures for opening and closing complaint files. Nor is it to comment on any alleged shortcomings in relation to those procedures.
64. Instead, my task is to determine what recorded information actually held by the Society falls within the scope of a given request. Thereafter, it is to determine to what extent (if at all) any exemptions to disclosure under the Code may apply. In doing so, I can only make a decision on the basis of the Code as it currently stands at the time of an adjudication.
65. I do not have any powers to investigate the manner in which the Society may have handled previous information requests or the extent to which (or why) it may have made errors or changed its position in relation to such previous requests. Finally, under the Code, I have no formal powers of censure regarding the Society's handling of information requests.
66. Nevertheless, at this point I do consider it appropriate to note that the Society's responses to the information requests in this matter appear hallmarked by an apparent inconsistency, a degree of opacity in terminology and a lack of clear explanation. This has hampered the Society in achieving the goal of transparency which is embodied in the Code.
67. By way of summary, there are six closed SRA files potentially falling within the scope of the Applicant's request. Initially, in response to a previous request by

H, the Society maintained that those closed files related to SRA investigations in respect of the Charity. It was clear on this point. However, on 2 April 2015 the Society told the Applicant that this was incorrect. It said that in fact it was AB, as a regulated individual, and not the Charity, who had been the subject of those investigations⁵.

68. The Society initially provided me with some of the information potentially in scope of the Applicant's request, but not all of it. The information provided at this point also included what the Society had referred to as the "*reports*", "*misconduct reports*" and "*investigation reports*".
69. These particular reports had clearly been made to the SRA not prepared by the SRA following an investigation. The Society did not take steps to explain this to the Applicant and did not take any steps to establish whether this was, in fact, the information which the Applicant sought.
70. I found the Society's position that no other type of report existed on any of the six closed files to be surprising and I sought clarification. The Society subsequently provided me with a full electronic copy of the complete contents of the six closed files. This material includes "Risk Assessment Profiles" in relation to some, but not all of the closed matters. I regard these as "reports" in the context of this request.
71. When providing the withheld information, and in response to my request, the Society's Information Compliance Manager specifically confirmed that the information which was provided to me was all of the information both it and the SRA held in relation to the six closed files. As noted above, I have no reason to doubt the veracity of that statement.
72. I have carefully read the entirety of the six closed files provided to me by the Society. It is on the basis of that reading, and the submissions made to me by the parties, that I make the following adjudication.

⁵ H subsequently had cause to complain to the Society in this regard – having been told that the SRA had investigated the Charity (something not within its remit) he had raised the issue with the Charity Commission. He was then told, following the Society's response to the Applicant that this was not correct. He expressed understandable concern that the Society had not contacted him or taken other steps to publically correct its earlier statement.

5.2 The Scope of the request

73. In his part (3) of his request, the Applicant seeks any and all correspondence between the SRA and the Charity and/or the Company on the six closed files. He has stated in clear terms that he does not seek any material from the open files or any of the correspondence between the SRA and AB in his *personal* capacity as a regulated individual.
74. The Applicant states that he is content for any personal names, other than the Charity Trustees (which are a matter of public record) to be redacted from any correspondence.
75. In part (4) of his request the Applicant seeks the “investigation reports” referred to in the Society’s email to him of 10 March 2015. The Society did not, in that email, define or explain its use of the term “investigation reports.” I have already noted the understandable (and in my view avoidable) confusion which appears to have arisen from the Society’s relatively unfocussed use of this term.
76. In his “*Note to the Adjudicator on Inspection of Files*” of 15 May 2015, the Applicant told me that he did not seek any of the reports made to the SRA which resulted in its investigations – rather, he sought reports of any description prepared by the SRA in respect of either the Charity and/or the Company and which related to the six closed files.
77. The Applicant acknowledged that the SRA is fully entitled to undertake an investigation in relation to AB as a regulated individual. He does not seek any of the information held by the Society which relates to AB solely in his personal capacity as a regulated individual. It is information about the Charity and/or Company he seeks.
78. However, in respect of both parts (3) and (4) of his request, where AB is acting as an agent on behalf of the Charity and/or Company, the Applicant seeks that information.

5.3 The Correspondence

79. I have reviewed the entire body of correspondence and other material contained in the six closed files. This comprises a considerable volume of material and includes the initial “misconduct reports” (i.e. the third party complaints) to the SRA regarding the various issues which initiated the opening of the complaint files. The material also includes all of the correspondence, file notes and any documents which may reasonably be described as being a “report” prepared by the SRA which is held on those six closed files.
80. There is a considerable amount of duplication, both within and across the files, together with some material which has, apparently, been copied on to the files for reference purposes. This latter material does not actually touch on the investigations which are the subject matter of the closed files and does not fall within the scope of the Applicant’s request.
81. Despite its initial position when responding to H’s questions, the Society has maintained in this case that all of the correspondence the SRA conducted was with AB as a regulated individual and not with the Charity and/or Company as organisations.
82. The Applicant says this cannot be the case; he points to the Society’s earlier representations as underpinning his argument. In this respect, his arguments rely on the Society’s earlier representations being correct, and its revised position being incorrect. The Applicant says he sees the Society’s revised position as being, “*an eleventh hour attempt*” to avoid its obligations under the Code. He was unwilling to accept that the Society, when it initially responded to H, made a straightforward error.
83. Having reviewed the six closed files, I do not wholly share the Applicant’s scepticism. It is evident from my review that, with the exception of a number of specific items of correspondence which I deal with below, the material the

closed files contain is (as the Society now maintains) correspondence between the SRA and AB as a regulated individual.

84. Given this, in setting out my findings below, I do so on the basis that the Society itself has already chosen to put into the public domain the fact of, and certain details in relation to, the six closed files. That, as the Applicant notes, appears to include certain information which is AB's personal information.
85. The six closed files themselves all arise from concerns expressed about AB's activities and practising arrangements as a regulated individual. They do not arise from, or deal with, any complaints relating specifically to the operations of the Charity or the Company as entities. Some of the material in the closed files does, however, touch on the employer/employee relationship between AB and the Charity and in particular the public representations made by or on behalf of the Charity and/or Company on websites and note paper, which arose from that relationship. This is understandable, given that employer / employee relationship and the SRA's role in regulating AB.
86. Contrary to the Society's original answer to H, there is no indication from any of the files that the SRA investigated (or, at any point, *thought* that it was investigating) either the Charity or the Company in its own right. It is abundantly clear from various notes on all six files that, throughout the life of those matters, the SRA was clear that both the Charity and the Company were not subject to its regulation.
87. There is not any evidence on any of the six closed files which would suggest that the SRA had acted, or investigated, in an *ultra vires* manner.
88. Consequently, after an exhaustive examination of the withheld material, I conclude that the significant majority of the correspondence held on closed files was between AB as an individual and the SRA as his regulator. As such, that correspondence falls outside of the scope of part (3) of the Applicant's request: he says he does not seek this material.

89. I therefore find that the Society was correct to withhold this information, although I find that it did so for the wrong reasons: the Society's argument was that paragraphs 14.5 and 16 of Code applied to this material. As it was not in scope, these arguments were academic.
90. However, in certain limited exchanges of correspondence, the SRA did write to the Charity and/or the Company to addresses with them the representations made on on-line and on the Company's note paper. These representations arose from, and related directly to, the activities of AB as a regulated individual. Although not a matter within the scope of this adjudication, it appears to me that for the SRA to address such matters to an unregulated employer in respect of a regulated employee is an entirely proper (and not unexpected) thing for it to do. That correspondence, tackling issues the SRA was responsible for by virtue of its regulatory role, was addressed to and was responded to by, AB in his capacity as an agent or representative of those organisations. In these instances, he does not write in his private capacity as a regulated individual.
91. As such, I find that this body of material does fall within the scope of part (3) of the Applicant's request. I therefore now go on to consider the application of the Code to that material.

Paragraph 14.5 of the Code

92. The Society argued that paragraph 14.5 of the Code is engaged in relation to any correspondence between the SRA and AB, because it "*is about specific investigations, disciplinary cases or applications arising from our regulatory role*". It says that the public interest balancing exercise favours maintaining the exemption, for the reasons it set out in its submissions to me.
93. The Society did not raise its arguments in respect of correspondence between the SRA and the Charity and/or Company, because it maintained that all of the correspondence was between the SRA and AB. Nevertheless, and in the interests of balance, having found that is not the case I will take the Society's position which is set out at paragraphs 39 – 43 above as being as though

advanced in relation to the correspondence between the SRA and the Charity and/or Company.

94. The Applicant's position on this point is that paragraph 14.5 of the Code cannot be engaged at all by such material. This argument is advanced on the basis that the Charity and Company are not subject to regulation by the SRA; any correspondence with them in such a context therefore cannot engage the SRA's regulatory functions and in turn, cannot engage paragraph 14.5 of the Code.
95. I do not find this argument persuasive. Representations and statements published by a non-regulated entity, but which relate to services and expertise provided by a regulated individual in its employment, are clearly matters which may engage the SRA's regulatory functions. This is so by virtue of the SRA's relationship with the regulated individual who is employed by such an organisation. Consequently, there is no reason why correspondence between the SRA and such an employer may not, in certain circumstances, engage paragraph 14.5 of the Code. Whilst, as the Applicant noted in his submissions, the SRA may not compel a non-regulated body to cooperate with an investigation (or even respond to correspondence) it would clearly be in its interests to do so; the status of its employee providing its legal services may depend upon it.
96. Furthermore, the Applicant's argument would, if taken to its conclusion, mean that in a case where the SRA was investigating a complaint of financial misconduct in a regulated firm, and it were to enter correspondence with the firm's accountants, such correspondence would not attract the protection of paragraph 14.5 of the Code because the Society has no regulatory oversight of accountants. Clearly, that cannot be right; it would defeat the interest which paragraph 14.5 of the Code is designed to protect.
97. By way of side note, it is apt at this point to address certain issues of construction and interpretation raised by the Applicant in his submissions to me. I do so because these issues are of wider application than this adjudication alone.

98. The Applicant argued before me that Code is a formal document and should be interpreted in accordance with the standard tenets of construction, and specifically, (i) the *contra proferentem* principle, (ii) its opening, over-arching words (i.e. “*we believe in being open about what we do*”) and (iii) what he termed “*the general presumption that information should be disclosed rather than withheld.*”
99. Interpreting the Code in accordance with its stated intention is clearly correct. However, the Code is intended to confer rights which reflect the statutory framework of FOIA. Accordingly, in order to balance the interests of transparency with the protection of those legitimate interests which are the subject of exemptions under the Code, it seems to me that a purposive approach to interpretation is the appropriate one in cases where ambiguities arise in relation to the Code.
100. On this point, the Applicant suggested that the Code mirrors only section 30 of FOIA. In my analysis, that is not correct; paragraph 14.5 of the Code is relatively straightforward and relatively open in its wording; it appears to me that, in addition to section 30 FOIA, paragraph 14.5 of the Code also seems intended to encompass at least some of the elements which are protected by section 31 FOIA.
101. Whilst the overarching thrust of the Code is clearly and by definition one of transparency, it does not contain a “*general presumption*” that information should be disclosed, just as there is no such general presumption contained in FOIA itself. This is in marked contrast to the explicit presumption contained in the Environmental Information Regulations 2004. Instead, requests are to be assessed on a case by case basis and, where required, disclosure considered in light of the public interest balancing exercise.
102. The Applicant also sought to persuade me that, by virtue of the fact that all of the complaints in question are closed, paragraph 14.5 of the Code could not in any event apply. He referred me to the previous adjudication of *Re: Johns (2010)* and the Society’s Oversight Protocol as support of this contention.

103. However, given the purpose of the Code I can find no justification to support such a bright-line approach. The Applicant's reliance on the Oversight Protocol was unpersuasive as it took no account of context. Disclosure under the Code is disclosure to the world at large; it is of an entirely different character to the disclosures considered by the Oversight Protocol. That protocol concerns the relationship between two related arms-length bodies in the context of a regulatory and oversight system.
104. Likewise, I was unpersuaded by the argument that paragraph 14.5 of the Code *"imports a prejudice test"*. There is simply no justification for such an analysis in the wording of the Code itself. Here, I compare the wording of the Code to those exemptions in FOIA which are explicitly "prejudice based".
105. Rather, the question under paragraph 14.5 of the Code is a straightforward one, and it is this: is the information in dispute *"about specific investigations, disciplinary cases or applications arising from"* the Society's regulatory role? In simple terms, if the answer to that question is yes, then paragraph 14.5 of the Code will be engaged. Questions of prejudice fall to be considered under the public interest balancing exercise.
106. Finally, the Applicant argued that before the Society can invoke paragraph 14.5 of the Code it must be able to show that *"(ii) that investigation is being actively pursued at the time of the request and (iii) the requested information is so closely related to the investigation that to disclose that information would prejudice the investigation."*
107. Again, I find no support for this contention in either the plain wording of the Code itself, or by reference to the interests that paragraph is intended to protect. Paragraph 14.5 of the Code is simply not qualified by reference to either the currency or historic nature of the information in question. It is entirely conceivable that there will be certain cases where disclosure of material relating to an already closed investigation which is held by the Society may, if disclosed, give rise to prejudice in relation to other matters.

The fact that the information relates to a closed matter, or indeed a completely different matter, does not, in and of itself, preclude paragraph 14.5 of the Code from being engaged. Again, the question of prejudice in these circumstances is simply one factor for consideration under the public interest balancing exercise.

108. Accordingly, I found nothing in the Applicant's representations which persuaded me that the in-scope material held on the closed files did not engage paragraph 14.5 of the Code.

109. Therefore, in light of my examination of the closed files, I find that the correspondence between the SRA and the Charity and/or Company which is within the scope of the Applicant's request does engage the exemption at paragraph 14.5 of the Code.

The Public interest balance under paragraph 14.5

110. Having found that paragraph 14.5 of the Code is engaged, I now turn to consider whether or not the balance of the public interest favours maintaining the exemption or disclosing the information.

111. The Applicant argues that the public interest balancing exercise favours disclosure. He says there are strong arguments in favour of transparency and openness and in ensuring that the SRA undertakes its regulatory functions properly and effectively; he is concerned to establish that the SRA has not exceeded its powers in this case.

112. The Society argues the contrary, that the public interest favours maintaining the exemption. However, it does not advance any specific or detailed arguments by reference to the withheld information in support of its contention.

113. All of the Society's arguments in respect of the public interest are advanced in relation to the correspondence between the SRA and AB. However, and again in the interests of balance, I take these arguments as though they were made

in relation to the in-scope correspondence between the SRA and the Charity/and or Company.

114. Whilst I accept that certain types of information may, simply from an examination of the material itself, reveal a strong public interest in maintaining a particular exemption (and so should not be disclosed if the intention of the Code is to be given effect) such interests become far less obvious the older and more historic that information becomes.
115. In the present case, the correspondence in question is contained in closed files dating largely to 2012 and 2013. Other than a generalised and broad assertion that the public interest balance under paragraph 14.5 of the Code favoured maintaining the exemption, the Society has advanced no specific reasons in relation to this information as to why that should be so. Its arguments on this point were, at best, thin.
116. There is, nevertheless, a strong public interest in avoiding disclosures which may prejudice the SRA's regulatory and investigative functions.
117. Conversely, there is also a clear and strong public interest in both the profession and the wider public having a high level of confidence in the regulatory functions of the SRA, how it undertakes those functions and its ability to address, in a timely and proportionate fashion, any concerns which may arise in relation to the organisations and individuals which it regulates.
118. I accept that, on the particular facts of a given case, the public interest may favour withholding information in relation to a recently closed investigation. Where an investigation into a current similar matter is ongoing, that interest may extend to more historic cases. Inevitably, however, that interest (although not necessarily extinguished) is diminished with time.
119. The subject of the in-scope correspondence in this case relates to publically made and published statements on websites and on publically used notepaper in the period up to 2013. Those published statements arise directly from, and relate directly to, the services provided by the regulated individual.

120. To this extent, the subject matter of the investigation giving rise to the in-scope correspondence was of a fundamentally different character to, say, correspondence concerning an investigation arising from a private retainer or other, less public allegations of wrongdoing or bad practice. In this instance, although the SRA's concerns have been addressed with engagement, and the files closed without formal action, the issues giving rise to those concerns were always matter of public record.
121. There will be cases where the public interest clearly favours withholding information regarding investigations. That may be particularly so in a case where an investigation is closed, a complaint has not been upheld and disclosure of the simple fact of an unsubstantiated complaint may be damaging to the individual or firm concerned. In many such circumstances disclosure will be against the public interest. However, in the present case, such considerations do not arise - the public nature of the issues aside, here the Society has already disclosed the fact that there were investigations, that there are six closed files and that there are still open matters under consideration.
122. Whilst the manner in which the SRA conducts its investigations is not a matter for this adjudication, I would note that the correspondence appears to show the SRA pursuing its regulatory function and addressing its concerns in relation to those representations and statements in what appears to be a proportionate manner. It also shows the Charity and/or Company responding to those concerns. There is nothing in the correspondence, particularly in light of its age, which would seem likely to prejudice the SRA, the Charity and/or the Company or the regulated individual himself, if disclosed publically. Nor is there anything in the correspondence which, if disclosed, appears capable of prejudicing any ongoing investigations: the material concerned is already available to all parties to any such investigation.
123. As such, given the age and nature of the information in question, I can identify no strong public interest in this case in maintaining the exemption at paragraph 14.5 of the Code. Set in the balance against this is the public

interest in transparency, and in particular the public interest in showing that the SRA has undertaken its functions appropriately and in a properly focussed and timely manner.

124. I therefore find that the public interest under paragraph 14.5 of the Code favours disclosure of the in-scope correspondence.

Paragraph 16 of the Code

125. Having reached the above conclusion in respect of paragraph 14.5 of the Code, I now go on to consider whether or not paragraph 16 of the Code applies to the correspondence in question and whether it should be withheld on that basis.
126. As the Applicant has made clear, he does not seek information which relates to AB personally; such information is out of scope, and he only seeks that information which concern's the SRA's dealings with the Charity and/or Company. However, the Applicant acknowledges that information of the type he seeks may, in a case like this, be mixed with information which does comprise personal data. That is certainly the case here. The Applicant states that he is content for such information to be redacted.
127. An individual in a public facing role such as a director or trustee of a charity, or the director of a company, must reasonably expect certain of their personal information to properly be in the public domain. In the present case, AB, by virtue of his activities and profile, is evidently content for such information to be publically and widely available. Where such an individual corresponds with the SRA as an officer of either the Charity and/or the Company in an official capacity, I do not consider that there can be any reasonable expectation that correspondence may not, *in appropriate circumstances*, be disclosed by the Society in response to an FOI request. That is particularly so in the case of an individual who, as a member of the profession, has chosen to adopt a high public profile.

128. Accordingly, I do not find that paragraph 16 of the Code is engaged in relation to these elements of the in-scope correspondence which I have identified. The exception to this is in relation to small elements of that correspondence which comprises AB's sensitive personal data. Such material should be properly withheld under paragraph 16 of the Code.
129. I therefore find that the correspondence falling within the scope of the Applicant's request should be disclosed, subject to redaction of out of scope information and any elements of AB's sensitive personal data contained in the in-scope information.

5.4 The Reports

The SRA Reports

130. By way of preface to my consideration of the reports, it is necessary for me to note that the SRA appears to rely on pro-forma RAPs and closure forms aimed at recording its interactions with the types of organisations and individuals it most frequently deals with, namely law firms and individual solicitors. They do not appear particularly well suited to recording the nuances of its dealings with non-regulated entities. Nevertheless, from the face of the forms which are on the closed files, it is evident from the free-text boxes they contain that the SRA staff completing the forms were at all times clear as to the status of the Charity and the Company and the fact that they are not investigating those bodies.
131. I consider it important to highlight this point because it may go some way in accounting for the Society's confused response in relation to who or what the SRA was actually investigating.
132. Turning to the reports themselves, the closed files do not all contain a document which may be considered as a "report" prepared by the SRA, even if that term is taken at its loosest. Some of those closed files that do are files which relate entirely to AB as a regulated individual. As such, those reports fall outside the scope of the Applicant's request.

133. Some of the files include RAPs. I regard RAPs as reports for the purposes of the Applicant's request. Where such RAPs are held on the files which include elements of correspondence between the SRA and the Charity/Company identified above, I consider that these fall within the scope of the Applicant's request.
134. Likewise, some of the closed files include a file note or form by which the decision to close the file was recorded. In one case, the same form is copied across two files as that one form records the SRA's decision to close both files.
135. I consider that it is also possible to construe these forms and files notes as "reports" for the purposes of the Applicant's request, and I have done so.
136. For the same reasons as I found in relation to the correspondence on the closed files which are within scope of the request, I also find that any element of such "reports" which deal with the SRA's interaction with the Charity and/or Company engage paragraph 14.5 of the Code. However, and again for the same reasons, I find that the public interest balancing exercise favours disclosure. That disclosure is subject to redaction on the same terms as for the correspondence that I have found to be within scope of the request.
137. The exception to this is two specific elements of the RAPs. Here, due to the fact that there are ongoing open matters currently with the SRA, I find that the risk scores and the "RAG" rating on those forms should be withheld. I do so on the basis that disclosure is, on balance, likely to add very little to the public's understanding, but it may potentially prejudice open SRA matters. This would be contrary to the public interest.

The Misconduct Reports

138. These are the reports made to the SRA which resulted in each of the now closed investigation files being opened. These are the specific reports which the Society said were "*impossible to redact*". They are not within the scope of the Applicant's request and he has confirmed that he does not seek them. However, having reviewed the reports in question, I consider that the

Society's view is correct. In the case of these particular documents, in order for them to be disclosed in a form which disclosed neither the personal data of AB nor the complainants would require such extensive redactions as would render the remaining information effectively worthless.

6. STEPS

139. The Society is directed to disclose the information contained in the documents set out in the Schedule to this decision. That information is to be redacted pursuant to the following two paragraphs.
140. Certain of the documents identified in the Schedule require partial redaction. The Schedule sets out which documents those are and the basis of any redactions to be made. At the same time as providing this adjudication to the parties, I have also provided the Society with a copy of the documents listed in the Schedule, which have been marked to highlight that information which I direct should be redacted. I have not provided these documents to the Applicant, as to do so would disclose withheld information.
141. In the marked documents provided to the Society, I have not indicated redactions to the names of the Law Society's staff. The Applicant states that he has no objections to names other than the officers of the Charity and Company being redacted. I therefore leave it to the Society redact staff names if it considers it appropriate.
142. Finally, I have not provided the Applicant with a copy of the material I have directed to be disclosed in a fully redacted form myself because I am mindful that paragraph 17 of the Code permits the Society not to accept the terms of my adjudication. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

Adam Sowerbutts

Freedom of Information Adjudicator for the Law Society

31 July 2015

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