

Freedom of Information (Jersey) Law 2011

DECISION NOTICE – OIC REFERENCE 202-03-57259

Appendix 1

<u>Item Number</u>	<u>Redacted/ Withheld/ Out of Scope</u>	<u>Exemption Applied by SPA</u>	<u>Commissioner’s Finding</u>	<u>Steps Required?</u>
<u>File “Redacted Emails IG and PO”</u>				
<u>Tab 1 = Emails from Senator Gorst</u>				
1.	Redacted	Art.25	This email has been appropriately redacted.	No.
2.	Redacted	Art.25	<p>The subject line has been part redacted to reflect the fact that the email was sent on behalf of the Connétable, Simon Crowcroft (SC), by his secretary. SC’s email address has also been redacted.</p> <p>The Commissioner considers that this email has been over-redacted as it is clearly a response sent by Sir Philip Bailhache (PB) to SC, together with SC’s original email as sent by Ms Le Noury (SC’s PA).</p> <p>Also, it is unnecessary to redact Ms Le Noury’s contact details as they are readily available on the POSH website.</p>	<p>Yes.</p> <p>The SPA should provide a further copy of this email, with redactions removed in light of the Commissioner’s comments.</p>

3.	Redacted	Art.23 Art.25	The Commissioner does not accept the blanket rationale adopted by the SPA regarding the redaction of any "non-senior personnel names" i.e. those below the level of Chief Officer.	Yes. The SPA should provide a further copy of this email, with redactions removed in light of the Commissioner's comments.
4.	Disclosed	n/a	n/a	n/a
5.	Redacted	Art.35 NBC	<p>The Commissioner does not accept the blanket rationale adopted by the SPA regarding the redaction of correspondence which has simply been forwarded on from one minister, to another and which the SPA says does not properly fall within the definition of "ministerial correspondence".</p> <p>Actively forwarding on emails from unrelated third parties with attachments, such as pass between two ministers, means that such correspondence falls within the ambit of disclosure.</p> <p>The attachment to the email sent from PO to IG would fall within the definition of correspondence but has been appropriately withheld in the circumstances and the remainder of the email appropriately redacted.</p>	No.
6.	Redacted	NBC	The Commissioner does not accept the blanket rationale adopted by the SPA regarding the redaction of correspondence which has simply been forwarded on from one minister, to another and which the SPA	No.

			<p>says does not properly fall within the definition of “ministerial correspondence”.</p> <p>PO copied IG into the email chain and the email thus falls to be disclosed unless any exemptions apply i.e. Third Party data.</p> <p>The SPA have reviewed their position during the course of the Commissioner’s review and have indicated that they no longer wish to rely on the original exemption and that a copy of this message will be released to the complainant, albeit with certain redactions applied in respect of Art.25 personal data.</p> <p>The Commissioner considers that the redactions are appropriate in the circumstances.</p>	
7.	Redacted	NBC Art.25 Art.35	<p>The SPA appears to have applied their own rationale for redaction inconsistently. The final email in this exchange is between IG and Joe Moynihan (JM), the latter of which is not on the COM. It was, however, copied to PO.</p> <p>The Commissioner does, however, consider that the redactions applied were appropriate.</p>	No.
8.	Disclosed	n/a	n/a	n/a
9.	Redacted	Art.23 Art.25	<p>SPA has already indicated that the document contained some inappropriate redactions in relation to Eddie Noel (EN) (he was above level of PO) and PO’s mobile phone number (already disclosed elsewhere).</p>	<p>Yes.</p> <p>The SPA should provide a copy of this email with revised redactions</p>

				(which they have indicated they are prepared to do).
10.	Redacted	NBC Art.41	<p>The SPA appears to have applied their own rationale for redaction inconsistently.</p> <p>The final email in this exchange is between PO and a third party, the latter of which is not on the COM. It was, however, copied to IG.</p> <p>PO's mobile number has been inappropriately redacted (but provided elsewhere).</p> <p>The remainder of the email has been appropriately redacted.</p>	No.
11.	Redacted	Art.25	<p>EN's name has been inappropriately redacted.</p> <p>PO's mobile inappropriately redacted.</p> <p>Andrew Green's (AG) comments have been inappropriately redacted: they contain no third party identifying data.</p>	<p>Yes.</p> <p>Revised document needs to be disclosed.</p>
12.	Redacted	NBC	See IG6.	See IG6.
13.	Redacted	NBC	Whilst, the SPA has incorrectly redacted IG's email address (to whom the email was copied and which should have been left unredacted) the remainder of the email exchange is appropriately redacted.	No.
14.	Disclosed	n/a	<p>Main body email has been disclosed, absent attachment.</p> <p>Attachment not disclosed.</p>	<p>Yes.</p> <p>SPA to disclose attachment to email, namely Q&A_INVITE.PDF</p>

15.	Disclosed	n/a	n/a	n/a
16.	Redacted		Redaction not understood. If this has been redacted in relation to a name of a third party, it is unlikely the redaction would be deemed "personal information" as the third party cannot be identified.	Yes. Unredacted email to be provided to the complainant
17.	Disclosed	n/a	n/a	n/a
18.	Withheld	NBC	Names of various States' Members, including those on the COM, and to whom the email has been cc'd have been incorrectly redacted namely, Sir Philip Bailhache (PB), Sean Power, Alan Maclean (AM), Sarah Ferguson, Paul Routier, Lyndon Farnham, Andrew Green and Simon Crowcroft. The email falls within the definition of "correspondence" given the fact that PO has cc'd in a number of individuals on the COM. That being so, the issue then becomes one of the identity of third parties. The emails in this chain have been over redacted but has been disclosed elsewhere.	No.
19.	Out of Scope	NBC	The SPA appears to have applied their own rationale for redaction inconsistently, having redacted EN's name as recipient whilst showing it in other areas. The Commissioner does not agree with the blanket rational applied by the SPA re so-called "NBC" correspondence. AM cc'd IG and LF (both members of the COM) to the email and thus bringing such within the	

			scope of the request. The question is then whether there is third party data, which might fall to be withheld.	
20.	Withheld	NBC	AM cc'd to this email IG, thus bringing such email exchange within the ambit of "correspondence" for the purposes of this request. See comments at #19 above.	Yes. Email with revised redactions to be provided to complainant.
21.	Redacted	Art.23	The SPA originally withheld this item on the grounds that it was NBC. Following review, however, it was disclosed (albeit in a slightly redacted form). The revised emails have been appropriately redacted.	No.
22.	Withheld	NBC	This email is copied to IG, EN, PR and AG and specifically states that the email has been copied to them. To say that the correspondence is NBC is artificial and unsustainable. That being said, third parties are identifiable and their identifying details should be withheld.	Yes. Email with revised redactions to be provided to complainant.
23.	Withheld	NBC	The Commissioner does not agree that this email exchange is deemed "NBC". IG sent an email to Connétable John Refault who was, at the relevant time, Assistant Minister for Health, Social Services and Housing. The Assistant Minister deputises for the Minister of the relevant Department and so to exclude Assistant Ministers from such	Yes. Document needs to be disclosed albeit with personal data of third party individuals appropriately redacted.

			<p>correspondence is artificial and, in the Commissioner's opinion, unsustainable¹.</p> <p>No other exemptions have been cited by the SPA in respect of this item but the Commissioner is cognisant of the fact that personal data of private individuals appears elsewhere in this email, which would be disproportionate to allow to enter the public domain.</p> <p>This email has been overly redacted.</p> <p>Complaint partially upheld.</p>	
24.	Withheld	NBC Art.25	This email has been appropriately redacted.	No.
25.	Redacted	NBC Art.25	This email has been appropriately redacted.	No.
26.	Redacted	NBC Art.25	<p>The SPA has incorrectly applied redactions to this item.</p> <p>The email was sent from IG <u>to PO</u> and a number of others. It is therefore within the ambit of the request. It is artificial in the Commissioner's view to have redacted the names of other States' members to whom the email was circulated (Montford Tadier and PR).</p>	No.

¹ See http://www.statesassembly.gov.je/AssemblyReports/2015/R.11-2015.pdf?_ga=1.147644855.1882903064.1428485009 and para.10 thereof which states, *inter alia*, that "The Council comprises the Chief Minister and Ministers, and is chaired by the Chief Minister, and in the absence of the Chief Minister, by the Deputy Chief Minister. In the absence of a Minister, and where one exists, an Assistant Minister shall attend in their place".

			It is noted, however, that the body of the email has been provided to the complainant in unredacted form.	
27.	Disclosed	n/a	n/a	n/a
28.	Disclosed	n/c	n/a	n/a
29.	Redacted	NBC Art.25	<p>The Commissioner does not agree that this email exchange is deemed "NBC". Anne Pryke (AP) sent an email to a number of individuals, cc'ing Connétable John Refault who was, at the relevant time, Assistant Minister for Health, Social Services and Housing and IG. The Assistant Minister deputises for the Minister of the relevant Department and so to exclude Assistant Ministers from such correspondence is artificial and, in the Commissioner's opinion, unsustainable.</p> <p>No other exemptions have been cited by the SPA in respect of this item but the Commissioner is cognisant of the fact that personal data of private individuals appears elsewhere in this email, which would be disproportionate to allow to enter the public domain.</p> <p>This email has been overly redacted.</p> <p>Complaint partially upheld.</p>	Yes. SPA to provide email with revised redactions.
30.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
31.	Redacted	NBC	The Commissioner does not agree that this email exchange is deemed "NBC". AP sent an email to a number of individuals, cc'ing Connétable	Yes.

		Art.25	<p>John Refault who was, at the relevant time, Assistant Minister for Health, Social Services and Housing and IG. The Assistant Minister deputises for the Minister of the relevant Department and so to exclude Assistant Ministers from such correspondence is artificial and, in the Commissioner's opinion, unsustainable.</p> <p>No other exemptions have been cited by the SPA in respect of this item but the Commissioner is cognisant of the fact that personal data of private individuals appears elsewhere in this email, which would be disproportionate to allow to enter the public domain.</p> <p>This email has been overly redacted.</p> <p>Complaint partially upheld.</p>	SPA to provide email with revised redactions together with any attachments (unless exemptions apply to those attachments).
32.	Disclosed	n/a	n/a	n/a
33.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
34.	Redacted	Art.25	<p>Redaction not understood.</p> <p>If this has been redacted in relation to a name of a third party, it is unlikely the redaction would be deemed "personal information" as it is impossible to identify anyone from the details which have been redacted.</p>	No.

			Notwithstanding the above, and in light of the fact that the remainder of the email has been provided, the Commissioner dismisses this complaint.	
35.	Redacted	NBC Art.24	<p>The Commissioner does not agree that this email exchange is deemed "NBC". IG sent the email to Ian Le Marquand (ILM) and PB in addition to other third parties.</p> <p>Further the SPA appears to have cited Art.24 incorrectly. Art.42 (Law Enforcement) would have been more appropriate.</p> <p>The Commissioner considers that, in fact, the email has been under-redacted.</p>	No.
36.	Disclosed	n/a	n/a	n/a
37.	Disclosed	n/a	n/a	n/a
38.	Disclosed	n/a	n/a	n/a
39.	Redacted	Art.25	PO's mobile phone number has been redacted, despite being disclosed elsewhere in documentation provided to Complainant.	No.
40.	Disclosed	n/a	n/a	n/a
41.	Redacted	NBC	The SPA originally sought to withhold disclosure of this item on the basis that it was not between the COM.	No.

			<p>The SPA reviewed their position during the course of the Commissioner's review and decided that they would no longer seek to claim that exemption and have indicated that they will release this message, albeit with certain redactions pertaining to Art.25 personal data.</p> <p>The redactions applied are deemed appropriate in the circumstances.</p>	
42.	Withheld	NBC	<p>This email was copied by PB to IG and thus does fall within the definition of correspondence. That being so, the next consideration is applying a suitable exemption.</p> <p>PB's email is disclosable; the rest of this item is not.</p>	<p>Yes.</p> <p>To provide further version of email with revised redaction.</p>
43.	Redacted	NBC	<p>This email was copied by PO to IG and AM and thus does fall within the definition of correspondence. That being so, the next consideration is applying a suitable exemption.</p> <p>The Commissioner is, however, cognisant of the fact that this item contains personal data.</p> <p>This item has been appropriately redacted (save for the redactions applied to the email addresses of AM and IG).</p>	No.
44.	Withheld	NBC	<p>This email was copied by PB to IG and thus does fall within the definition of correspondence. That being so, the next consideration is applying a suitable exemption.</p> <p>The Commissioner is, however, cognisant of the fact that this item contains personal data.</p>	No.

			This item has been appropriately redacted (save for the redactions applied to the email address of IG.	
45.	Redacted	Art.25	<p>The Commissioner notes that the exemption is not being maintained in respect of certain recipients to the email who were either States' members at the time of the email or were appointed following the election. This is inconsistent with the SPA's previous assertions and exemptions applied in respect of other emails.</p> <p>The Commissioner agrees that the redaction of Deputy Le Herissier's personal email address is appropriate in the circumstances.</p>	<p>Yes.</p> <p>To provide further version of email with revised redaction.</p>
46.	Redacted	Art.25	This email replicates, of the most part, IG45 save for a further email, which has been disclosed in its entirety.	No.
47.	Redacted	NBC Art.25 Art.35	<p>The Commissioner does not agree that this email exchange is deemed "NBC". IG cc'd the email to PR, EN and PO, in addition to other third parties.</p> <p>In addition, this email has been over-redacted in terms of information which might lead to the identification of the third party.</p> <p>The third party's personal information can easily be redacted to conceal their identity but there can be no rationale for deleting the subject matter of the email sent by the third party (nor the contents of such email), who cannot be identified from that information.</p> <p>In addition, the SPA has sought to redact a part of the third party's email dealing with advice received from the LOD. That advice cannot</p>	<p>Yes.</p> <p>To provide further version of email with revised redaction.</p>

			be deemed as privileged given that IG is providing details of that advice to an unrelated third party to whom privilege cannot attach.	
48.	Withheld	NBC	The Commissioner does not agree that this email exchange is deemed "NBC". IG cc'd the email to AP. The Commissioner notes, however, that a copy of this email has already been provided at item 50.	No.
49.	Redacted	Art.25	Paul Routier's name inappropriately redacted as recipient of email. Other redactions appropriate.	No.
50.	Redacted	NBC	Inconsistency of redactions applied by the SPA. Part of this email chain replicates IG48 which SPA sought to withhold previously. Redactions actually applied in this instance are appropriate.	No.
51.	Redacted	NBC	See response at IG50.	No.
52.	Withheld	NBC	The Commissioner does not agree that this email exchange is deemed "NBC". PB cc'd the email to PO, IG and other third parties. Incorrect exemption apparently cited. The information, however, should be withheld.	No.
53.	Withheld	NBC	The Commissioner does not agree that this email exchange is deemed "NBC". PO replied to an email as sent to PB.	No.

			<p>Incorrect exemption apparently cited.</p> <p>The information, however, should be withheld.</p>	
54.	Redacted		<p>This email was initially withheld on the basis that it was NBC. The SPA subsequently reviewed the position and disclosed the email chain, albeit with certain redactions applied.</p> <p>The Commissioner notes that the SPA has also left unredacted the name and email exchange with a third party (not a States member).</p>	No.
55.	Redacted	<p>Art.25</p> <p>Art.23</p>	<p>SPA has reviewed position and released an unredacted version of the email to the Complainant.</p> <p>The Commissioner notes that, again, the SPA has exhibited an inconsistent approach to redaction regarding the names of States members not on the COM at the relevant time.</p>	No.
56.	Redacted	<p>Art.25</p> <p>Art.23</p>	<p>First email in chain is from PO to IG. PO's name has been inappropriately redacted.</p>	<p>Yes.</p> <p>Disclose the first email in the chain as between PO and IG.</p>
57.	Withheld	NBC	<p>This email has been over-redacted.</p> <p>Email from Alan Maclean to EN, cc'd to IG and LF re an application for funding and earlier email string has been inappropriately redacted.</p> <p>Third party information appropriately redacted.</p>	<p>Yes.</p> <p>Emails from AM/EN should be disclosed with suitable redactions to protect third party data.</p>

58.	Disclosed	n/a	n/a	n/a
59.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
60.	Disclosed	n/a	n/a	n/a
61.	Disclosed		Name of PR inappropriately redacted, otherwise rest of document was disclosed in full.	No.
62.	Disclosed		Name of PR inappropriately redacted, otherwise rest of document was disclosed in full.	No.
63.	Disclosed	n/a	n/a	n/a
64.	Redacted	Art.23 Art.25	Name of PR inappropriately redacted, otherwise rest of document was appropriately redacted.	No.
65.	Disclosed	n/a	n/a	n/a
66.	Disclosed	n/a	n/a	n/a
67.	Disclosed		Name of PR inappropriately redacted, otherwise rest of document was disclosed in full.	No.
68.	Disclosed	n/a	n/a	n/a
69.	Disclosed	n/a	n/a	n/a

70.	Disclosed	n/a	n/a	n/a
71.	Disclosed	n/a	n/a	n/a
72.	Disclosed	n/a	n/a	n/a
73.	Disclosed		Name of PR inappropriately redacted, otherwise rest of document was disclosed in full.	No.
74.	Disclosed		Name of PR inappropriately redacted, otherwise rest of document was disclosed in full.	No.
75.	Disclosed		Name of PR inappropriately redacted, otherwise rest of document was disclosed in full.	No.
76.	Disclosed		Name of PR inappropriately redacted, otherwise rest of document was disclosed in full.	No.
77.	Disclosed	n/a	n/a	n/a
78.	Disclosed	n/a	n/a	n/a
79.	Disclosed	n/a	n/a	n/a
80.	Withheld	NBC	This email has been appropriately withheld.	No.
81.	Disclosed		Name of PR inappropriately redacted, otherwise rest of document was disclosed in full.	No.

82.	Redacted	Art.25	Name of PR and EN inappropriately redacted, otherwise rest of document was disclosed in full save for third party information which has been appropriately withheld.	No.
83.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
84.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
85.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
86.	Disclosed	n/a	n/a	n/a
87.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
88.	Disclosed	n/a	n/a	n/a
89.	Withheld	NBC	This email has been appropriately withheld.	n/a
90.	Disclosed	n/a	n/a	n/a
91.	Disclosed		Name of PR and EN inappropriately redacted, otherwise rest of document was disclosed in full.	No.

92.	Redacted	Art.23 Art.25 Art.34	Inconsistent redaction applied to PR's name. SPA has indicated that the other names will be disclosed given that those individuals are in public roles. The remainder of the email has been appropriately redacted.	Yes. Disclose email with names of public officials who had previously been redacted.
93.	Disclosed.		Name of PR and EN inappropriately redacted, otherwise rest of document was disclosed in full.	No.
94.	Disclosed.		Name of PR and EN inappropriately redacted, otherwise rest of document was disclosed in full.	No.
95.	Redacted	Art.23 Art.25 Art.34	SPA has indicated that other names will be disclosed where those individuals are in public roles. The remainder of the email has been appropriately redacted.	Yes. Disclose email with names of public officials who had previously been redacted.
96.	Disclosed	n/a	n/a	n/a
97.	Redacted		The SPA has indicated that this email has been disclosed in full but, in fact, the names of certain serving States Members have been redacted.	See AG48
98.	Disclosed	n/a	n/a	n/a
99.	Redacted.	Art.23 Art.25	This email has been appropriately redacted.	No.

100.	Disclosed	n/a	n/a	n/a
101.	Disclosed	n/a	n/a	n/a
102.	Redacted	Art.25	This email has been appropriately redacted.	No.
103.	Redacted	Art.25	This email has been appropriately redacted.	No.
104.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
105.	Disclosed	n/a	n/a	n/a
106.	Disclosed	n/a	n/a	n/a
107.	Disclosed	n/a	n/a	n/a
108.	Withheld	NBC	This is an email exchange from PO to IG and should have been disclosed subject to applicable exemptions. Third party data has, however, been appropriately redacted.	Yes. Disclose the initial email between PO and IG.
109.	Withheld	NBC	This is an email exchange from PO to IG and should have been disclosed subject to applicable exemptions. Third party data has, however, been appropriately redacted.	Yes. Disclose the initial email between PO and IG.
110.	Withheld	NBC	This email has been appropriately withheld.	No.
111.	Redacted	Art.25	This email has been appropriately redacted.	No.

112.	Withheld	NBC	This email has been appropriately withheld.	No.
113.	Redacted	Art.23 Art.25	Name of PR inappropriately redacted. Similarly, name of proposed Jurat and person nominating need not have been redacted as both were in the public domain.	Yes, Full email to be disclosed.
114.	Redacted	Art.23 Art.25	See comments for IG113. Name of PR inappropriately redacted. Similarly, name of proposed Jurat and person nominating need not have been redacted as both were in the public domain. Name of staff member appropriately redacted.	Yes, Full email to be disclosed save for third party information.
115.	Redacted	Art.23 Art.25	See comments for IG113. Name of PR inappropriately redacted. Similarly, name of proposed Jurat and person nominating need not have been redacted as both were in the public domain. Name of staff member appropriately redacted.	Yes, Full email to be disclosed save for third party information.
116.	Disclosed	n/a	n/a	n/a
117.	Redacted	NBC	Inconsistency by SPA. Email from PO to a third party cc'ing IG has been disclosed subject to certain redactions as to third party data. The email has been appropriately redacted.	No.
118.	Redacted	Art.23	SPA is not maintaining exemption under Art.25 in respect of redacted names of PR and EN, as elected states members.	Yes.

		Art.25	Also, PO's mobile number has been disclosed elsewhere (inconsistency of redaction).	Full email to be provided.
119.	Disclosed		Attachment "Blank 36.docx" does not appear to have been disclosed albeit main body email has.	Yes. SPA to consider attachment Blank36.docx and consider whether such should be disclosed.
120.	Disclosed	n/a	n/a	n/a
121.	Disclosed	n/a	n/a	n/a
122.	Disclosed	n/a	n/a	n/a
123.	Disclosed	n/a	n/a	n/a
124.	Disclosed	n/a	n/a	n/a
125.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
126.	Withheld	NBC	This email has been over-redacted. PO cc'd IG and PB to this email.	Yes. SPA to reconsider disclosure of this email.
127.	Disclosed	n/a	n/a	n/a
128.	Redacted	NBC	This email has been appropriately redacted.	No.

129.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
130.	Redacted	Art.23 Art.25 Art.35	SPA has reconsidered position and is not maintaining the Art.25 exemption. Commissioner also notes the incorrect application of Art.35.	Yes. Disclose full email.
131.	Disclosed	n/a	n/a	n/a
132.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
133.	Disclosed	n/a	n/a	n/a
134.	Disclosed	n/a	n/a	n/a
135.	Disclosed	n/a	n/a	n/a
136.	Redacted	Art.23 Art.25 Art.35	Attachment has been redacted and not provided. The SPA has since advised that they will not maintain the exemption for the remainder of the email chain.	Yes. SPA to review attachment and provide unless relevant exemptions apply.
137.	Redacted.	Art.23 Art.25	The SPA has since advised that they will not maintain the exemption and an unredacted version of the email will be provided to the complainant.	Yes.

				SPA to provide unredacted version of email, as indicated.
138.	Redacted	Art.23 Art.25 Art.35	See comments made for IG136. Attachment has been redacted and not provided. The SPA has since advised that they will not maintain the exemption for the remainder of the email chain. Commissioner notes that inconsistent redaction exists between this and IG136.	Yes. SPA to review attachment and provide unless relevant exemptions apply.
139.	Redacted	Art.23 Art.25	This email was appropriately redacted. Commissioner notes the inconsistent redaction which has been applied between this and IG136 and IG138.	No.
140.	Redacted	Art.23 Art.25	The names of certain other serving States Members have been redacted (names which the SPA has, in respect of other emails, indicated that they will not continue to rely on that exemption) but otherwise, the email has been appropriately redacted.	Yes. SPA to provide a copy of email without names of certain States members redacted.
141.	Disclosed	n/a	n/a	n/a
142.	Disclosed	n/a	n/a	n/a
143.	Redacted	Art.23. Art.25	SPA has indicated that it is not maintaining the Art.25 exemption.	Yes.

				SPA to provide unredacted version of email, as indicated.
144.	Redacted	Art.23. Art.25	This email has been appropriately redacted.	No.
145.	Redacted	Art.23. Art.25	This email has been appropriately redacted.	No.
146.	Disclosed	n/a	n/a	n/a
147.	Disclosed	n/a	n/a	n/a
148.	Redacted	Art.23. Art.25	This email has been appropriately redacted.	No.
149.	Redacted	Art.23. Art.25 Art.35	This email has been appropriately redacted.	No.
150.	Redacted	Art.23. Art.25 Art.35	The SPA has indicated that the exemption in respect of Art.35 information will not be maintained and have provided an unredacted version of this email to the Complainant.	No.

151.	Redacted	Art.23. Art.25 Art.35	The SPA has indicated that the exemption in respect of Art.35 information will not be maintained and have provided an unredacted version of this email to the Complainant.	No.
152.	Redacted	Art.23. Art.25	This email has been appropriately redacted.	No.
153.	Redacted	Art.23. Art.25	The SPA has indicated that PO's mobile number has already been provided, unredacted, and thus the Art.25 exemption will not be maintained.	No.
154.	Redacted	Art.23. Art.25	The SPA has indicated that PO's mobile number has already been provided, unredacted, and thus the Art.25 exemption will not be maintained.	No.
155.	Redacted	Art.23. Art.25	This email has been appropriately redacted.	No.
156.	Disclosed	n/a	n/a	n/a
157.	Disclosed	n/a	n/a	n/a
158.	Disclosed	n/a	n/a	n/a
159.	Redacted	Art.41	This email has been appropriately redacted.	No.
160.	Disclosed	n/a	n/a	n/a

161.	Redacted	Art.23 Art.25	This email has been appropriately redacted save for redacting the names of PR and EN (serving members of the States).	No.
162.	Redacted	NBC	This email has been appropriately redacted.	No.
163.	Disclosed	n/a	n/a	n/a
164.	Disclosed	n/a	n/a	n/a
165.	Redacted	Art.23 Art.25	This email has been appropriately redacted save for redacting the names of PR and EN (serving members of the States).	No.
166.	Disclosed	n/a	n/a	n/a
167.	Redacted	Art.23 Art.25	This email has been appropriately redacted save for redacting the names of certain serving members of the States which the SPA has indicated elsewhere an exemption will not be maintained.	No.
168.	Redacted	Art.23 Art.25	This email has been appropriately redacted save for redacting the names of certain serving members of the States which the SPA has indicated elsewhere an exemption will not be maintained.	No.
169.	Disclosed	n/a	n/a	n/a
170.	Redacted	Art.23 Art.25	This email has been appropriately redacted save for redacting the names of certain serving members of the States which the SPA has indicated elsewhere an exemption will not be maintained.	No.

171.	Redacted	Art.23 Art.25	This email has been appropriately redacted save for redacting the names of certain serving members of the States which the SPA has indicated elsewhere an exemption will not be maintained.	Yes. Email chain with unredacted names of serving States members to be provided to the complainant unredacted.
172.	Redacted	Art.23 Art.25	This email has been appropriately redacted save for redacting the names of certain serving members of the States which the SPA has indicated elsewhere an exemption will not be maintained.	No.
173.	Disclosed	n/a	n/a	n/a
174.	Disclosed	n/a	n/a	n/a
175.	Redacted	Art.23. Art.25	This email has been appropriately redacted.	No.
176.	Disclosed	n/a	n/a	n/a
177.	Disclosed	n/a	n/a	n/a
178.	Redacted	NBC	This email has been over-redacted. IG's name has been redacted as being cc'd and EN was one of the recipients.	Yes. SPA to review initial email in chain and provide unredacted version (taking into account any other exemptions which may apply).

				The remainder of the email has been correctly redacted.
179.	Redacted	NBC	This email has been over-redacted. Sent from IG to PO (and others) and should have been disclosed, subject to any appropriate exemptions.	Yes. SPA to review initial email in chain and provide unredacted version (taking into account any other exemptions which may apply).
180.	Redacted	Art.23. Art.25	This email has been appropriately redacted.	No.
181.	Redacted	Art.23. Art.25	This email has been appropriately redacted.	No.
182.	Redacted	Art.25	This email has been over-redacted in that the name of a serving States member has been redacted. SPA has since indicated that it would not seek to rely on Art.25 exemption in respect of serving States members. It is also noted that Lyndon Farnham's details have been disclosed in an email further down the chain, so a lack of consistency in redaction.	Yes. SPA to review initial email in chain and provide unredacted version (taking into account any other exemptions which may apply).
183.	Redacted	Art.25	See comments in respect of IG182. Inconsistencies in redaction applied to the same email as seen in IG182 and IG183.	Yes. SPA to review initial email in chain and provide unredacted version

				(taking into account any other exemptions which may apply).
184.	Redacted	NBC	This email has been over-redacted in that the name of a serving States member has been redacted as has the subject matter of the email. SPA has since indicated that it would not seek to rely on Art.25 exemption in respect of serving States members.	Yes. SPA to review initial email in chain and provide unredacted version (taking into account any other exemptions which may apply).
185.	Redacted	Art.25	See comments in respect of IG182. Inconsistencies in redaction applied to the same email as seen in IG182 and IG183.	Yes. SPA to review initial email in chain and provide unredacted version (taking into account any other exemptions which may apply).
186.	Disclosed	n/a	n/a	n/a
187.	Disclosed	n/a	n/a	n/a
188.	Redacted	Art.23 Art.25	Save for PO's mobile number which has been disclosed elsewhere, the remainder of the email has been appropriately redacted.	No.
189.	Redacted	Art.23. Art.25	This email has been appropriately redacted.	No.
190.	Redacted	Art.23.	This email has been appropriately redacted (save for name of serving States member)	No.

		Art.25		
191.	Redacted	Art.23. Art.25	This email has been appropriately redacted.	No.
192.	Disclosed	n/a	n/a	n/a
193.	Redacted	Art.23. Art.25	Attachments to email were not originally provided, despite their existence being disclosed to the complainant. The SPA has since identified the attachments and has confirmed that such will be provided to the complainant. Remainder of email has been appropriately redacted.	Yes. SPA to consider the attachments to this email and disclose unless relevant exemption applies.
194.	Redacted	Art.23. Art.25	This email has been over-redacted in that the names of certain serving States members have been redacted. SPA has since indicated elsewhere that it would not seek to rely on Art.25 exemption in respect of serving States members.	Yes. SPA to review initial email in chain and provide unredacted version (taking into account any other exemptions which may apply).
195.	Disclosed	n/a	n/a	n/a
196.	Disclosed	n/a	n/a	n/a
197.	Disclosed	n/a	n/a	n/a
198.	Redacted	Art.25 Art.41	See AG84 where this email has been disclosed, on the whole, without redactions.	No.

199.	Redacted	NBC	This email has been over-redacted in that IG's name has been redacted (to whom email was cc'd) when it should not have been. Further names of serving states members have also been redacted.	Yes. SPA to review email in light of Commissioner's findings and provide an appropriately redacted version.
200.	Redacted	Art.25	Inconsistency in redactions applied by the SPA in the PR's name has been included as recipient of the email which he is not on the Council of Ministers. The remainder of the email has been appropriately redacted.	No.
201.	Redacted	Art.25	This email has been appropriately redacted.	No.
202.	Redacted	Art.25	See comments in respect of IG200.	No.
203.	Redacted	Art.25	See comments in respect of IG200.	
204.	Redacted	Art.25	PO's mobile number has been disclosed elsewhere.	No.
205.	Redacted	Art.25	The Commissioner considers that the redacted sections of the email are not RD's personal data and should be disclosed.	Yes. SPA to provide an unredacted version of the email.
206.	Disclosed	n/a	n/a	n/a
207.	Disclosed	n/a	n/a	n/a
208.	Redacted	Art.23	This email has been over-redacted.	Yes.

		Art.25 Art.35	SPA has indicated that it will issue a revised version of the email with limited redaction, with which the Commissioner agrees.	SPA to provide further version of email to Complainant with appropriate redactions.
<u>Tab 2 = Emails from Philip Ozouf</u>				
1.	Redacted	Art.35 NBC	See response provided for IG5. The Commissioner notes that heavier redaction has been applied to PO1 and thus an inconsistent approach to redaction by the SPA.	As per IG5
2.	Redacted	Art.35 NBC	See response provided for IG6. The Commissioner notes that heavier redaction has been applied to PO2 and thus an inconsistent approach to redaction by the SPA.	As per IG6
3.	Redacted	NBC	See response provided for IG7. The Commissioner notes that heavier redaction has been applied to PO3 and thus an inconsistent approach to redaction by the SPA.	As per IG7
4.	Disclosed	n/a	n/a	n/a
5.	Redacted	Art.25	See response provided for IG11. The Commissioner notes that heavier redaction has been applied to PO5 and thus an inconsistent approach to redaction by the SPA.	As per IG11.
6.	Redacted	Art.25	This email has been appropriately redacted.	No.

7.	Redacted	Art.25	This email has been appropriately redacted and the attachment will be provided to the complainant.	No.
8.	Redacted	Art.23 Art.25	This email has been appropriately redacted. The Commissioner notes, however, that the attachment to the email timed at 17:06 has not been provided, despite its existence being disclosed.	Yes. SPA to consider attachment and to disclose it to Complainant saving for any exemptions which may apply.
9.	Redacted	Art.23 Art.25	This message has been overly redacted: this was an email from PO to AG and should have been disclosed	Yes. SPA to provide unredacted copy of that email to Complainant.
10.	Redacted	NBC Art.41	See IG10. Redactions have been applied inconsistently by the SPA and this version has been over-redacted compared to IG10.	See IG10.
11.	Redacted	Art.25	See IG11	See IG11
12.	Redacted	Art.25	See IG12 Redactions have been applied inconsistently by the SPA and this version has been over-redacted compared to IG12.	See IG12
13.	Disclosed	n/a	n/a	n/a
14.	Disclosed	n/a	n/a	n/a

15.	Redacted	Art.25	This email has been appropriately redacted.	No.
16.	Disclosed	n/a	n/a	n/a
17.	Redacted	Art.25	The SPA has indicated elsewhere that it would not be applying the Art.25 exemption in respect of serving States members. The remainder of the email has been appropriately redacted.	Yes. SPA to review email chain re serving States members not on COM.
18.	Withheld	NBC	This email has been appropriately redacted.	No.
19.	Redacted.	Art.25	See IG21. PO19 has been redacted inconsistently with IG21. Also, although attachments have been identified and their existence disclosed to the Complainant, none of the attachments were disclosed initially. The SPA has, however, identified the attachments and these will be provided to the complainant.	Yes. SPA to consider attachments and whether or not such should be disclosed, subject to any applicable exemptions.
20.	Withheld	NBC	This email has been appropriately redacted.	No.
21.	Withheld	NBC	This email has been appropriately redacted.	No.
22.	Withheld	NBC	This email has been appropriately redacted.	No.
23.	Withheld	NBC	This email has been appropriately redacted.	No.
24.	Redacted	Art.23	This email has been appropriately redacted.	No.

		Art.25		
25.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
26.	Disclosed	n/a	n/a	n/a
27.	Disclosed	n/a	n/a	n/a
28.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
29.	Disclosed	n/a	n/a	n/a
30.	Withheld	NBC	This email has been appropriately redacted.	No.
31.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
32.	Disclosed	n/a	n/a	n/a
33.	Disclosed	n/a	n/a	n/a
34.	Disclosed	n/a	n/a	n/a
35.	Disclosed	n/a	n/a	n/a
36.	Disclosed	n/a	n/a	n/a

37.	Withheld	NBC	This email has been appropriately redacted.	No.
38.	Withheld	NBC	This email has been appropriately redacted.	No.
39.	Redacted	Art.25 Art.35	See IG47 The Commissioner notes that PO39 has been redacted inconsistently with IG47.	See IG47
40.	Redacted	Art.25	Save that a serving States member's name has been redacted, the remainder of the email has been appropriately redacted.	No.
41.	Redacted	Art.25	This email has been appropriately redacted.	No.
42.	Redacted.	NBC	This email has been appropriately redacted.	No.
43.	Redacted.	NBC	This email has been appropriately redacted.	No.
44.	Withheld	NBC	This message has been over-redacted. The first email in the chain was sent from IG to PO and should have been disclosed. The remainder of the email was appropriately redacted.	Yes. SPA to provide appropriately unredacted version of email, subject to any exemptions which may apply to the remainder of the email.
45.	Redacted	Art.23 Art.25	This message has been over-redacted to redact the name of a member of the States. The SPA has indicated that it will provide an unredacted version of this email.	Yes. SPA to provide unredacted version of email, as indicated.

46.	Redacted	Art.23 Art.25	See IG54 and IG56	See IG54 and IG56.
47.	Withheld	NBC	This message has been appropriately redacted.	No.
48.	Withheld	NBC	This message has been appropriately redacted.	No.
49.	Disclosed	n/a	Save that a serving States member's name has been redacted, the email has been disclosed.	n/a
50.	Disclosed	n/a	Save that a serving States member's name has been redacted, the email has been disclosed.	n/a
51.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
52.	Disclosed	n/a	n/a	n/a
53.	Disclosed	n/a	n/a	n/a
54.	Disclosed	n/a	n/a	n/a
55.	Disclosed	n/a	n/a	n/a
56.	Redacted	Art.23 Art.25	This email has been appropriately redacted. The attachments to the email were not provided to the complainant with the original disclosure, but the SPA has since identified the	No.

			attachments and confirmed that such will be provided to the complainant.	
57.	Disclosed	n/a	n/a	n/a
58.	Redacted	NBC	Save that a serving States member's name has been redacted, the remainder of the message has been appropriately redacted.	
59.	Redacted	Art.23 Art.25	Certain serving States members' names have been redacted. The remainder of the email has been appropriately redacted.	No.
60.	Redacted.	Art.25	This message has been appropriately redacted.	No.
61.	Redacted	Art.25	Certain serving States members' names have been redacted. The remainder of the email has been appropriately redacted.	No.
62.	Redacted	Art.23 Art.25	See IG12 and IG85. The Commissioner notes that redactions have been applied inconsistently between PO62 and IG12 and IG85,	See IG12 and IG85
63.	Redacted	Art.24 Art.41	The Commissioner considers that the Art.24 exemption was correctly engaged. The Art.41 exemption was, however, incorrectly engaged. The message has been correctly redacted.	No.
64.	Disclosed	n/a	n/a	n/a

65.	Disclosed	n/a	n/a	n/a
66.	Disclosed	n/a	n/a	n/a
67.	Redacted	Art.23 Art.25	This email has been appropriately redacted save for the name of a serving States member to whom email was cc'd	No.
68.	Disclosed	n/a	n/a	n/a
69.	Disclosed	n/a	n/a	n/a
70.	Withheld	NBC	This email has been over-redacted in that the first email in the chain is clearly between PO and IG forwarding on an email from a third party. The remainder of that email has been appropriately redacted.	Yes. SPA to provide the top email passing from PO to IG.
71.	Withheld	NBC	This email has been over-redacted in that the first email in the chain is clearly between PO and IG forwarding on an email from a third party. The remainder of that email has been appropriately redacted.	Yes. SPA to provide the top email passing from PO to IG.
72.	Withheld	NBC	This email has been over-redacted in that the sender of the email and certain individuals to whom the email has been cc'd have been redacted. The remainder of the email has been appropriately redacted.	Yes. SPA to provide the top email passing from AM to others (appropriately redacted).
73.	Disclosed	n/a	n/a	n/a

74.	Withheld	NBC	<p>This email has been partially disclosed elsewhere.</p> <p>The Commissioner notes the inconsistent approach by the SPA in relation to this item.</p>	No.
75.	Redacted	Art.23 Art.25	<p>See IG114.</p> <p>The Commissioner also notes that different redactions have been applied to PO75 and IG114.</p> <p>The SPA has left in the name of a States Member who was not part of the COM.</p>	See IG114.
76.	Redacted	Art.23 Art.25	The name of a serving States member has been redacted (whereas such was disclosed at PO75). The SPA has also left unredacted the name of a third party.	No.
77.	Redacted	Art.23 Art.25	The name of a serving States member has been redacted (whereas such was disclosed at PO75). The SPA has also left unredacted the name of a third party.	No.
78.	Withheld	NBC	The Commissioner notes that a version of this email has already been disclosed as part of the IG series. The SPA has thus been inconsistent in its redaction policy.	No.
79.	Redacted	Art.23 Art.25	Se IG118.	See IG118.
80.	Disclosed	n/a	n/a	n/a

81.	Withheld	NBC	The first email in the message is cc'd to various States members and members of the COM but those names have been redacted. The remainder of the email has been appropriately redacted.	Yes. SPA to provide a further copy of email with top message appropriately redacted.
82.	Redacted	Art.25	See IG129. It has been appropriately redacted.	See IG 129.
83.	Redacted	Art.25	PO's mobile number has been disclosed elsewhere.	No.
84.	Redacted	Art. 23 Art. 25 Art. 35	See IG138.	No.
85.	Redacted	Art. 23 Art. 25 Art. 35	See IG138.	No.
86.	Redacted	Art.23 Art.25	See IG38.	No.
87.	Redacted	Art.25	This email has been appropriately redacted.	No.
88.	Redacted	Art.25	This email has been appropriately redacted.	No.
89.	Disclosed	n/a	n/a	n/a

90.	Disclosed	n/a	n/a	n/a
91.	Disclosed	n/a	n/a	n/a
92.	Disclosed	n/a	n/a	n/a
93.	Withheld	NBC	The first email in the message is cc'd to various States members and members of the COM but those names have been redacted. The remainder of the email has been appropriately redacted.	Yes. SPA to provide a further copy of email with top message appropriately redacted.
94.	Redacted	Art.25	See IG194.	Yes. See IG194.
95.	Redacted	Art.35	See IG150 and IG151.	No.
96.	Redacted	Art.35	See PO95, IG150 and IG151.	No.
97.	Redacted	Art.23. Art.25	See IG152.	No.
98.	Disclosed	n/a	n/a	n/a
99.	Redacted	Art.25	This email has been appropriately redacted.	No.
100.	Redacted	Art.25	This email has been slightly over-redacted.	Yes. Of the redacted paragraph in the first email in the chain, the first

				<p>sentence should be disclosed in its entirety, the first four words of the second sentence should be disclosed and the third sentence should disclosed in its entirety.</p> <p>The remainder of the email has been appropriately redacted.</p>
101.	Disclosed	n/a	n/a	n/a
102.	Redacted	Art.25	It is noted that PO's mobile number has been disclosed elsewhere.	No.
103.	Redacted	Art.23 Art.25	<p>The first email in this chain has been over-redacted.</p> <p>The SPA has sought to rely on Art.25 (personal data) but the first paragraph which has been redacted does not disclose any personal data and does not, in the Commissioner's view, fall within the exemption.</p> <p>The second paragraph has been over-redacted in that rather than simply redacting the names of third parties, the SPA has redacted the entirety of the sentence.</p>	<p>Yes.</p> <p>SPA to review the first email in the chain and provide an un-redacted version in line with the Commissioner's comments.</p>
104.	Redacted	Art.25	The SPA has provided a further version of this email to the complainant. The redactions are deemed appropriate.	No.
105.	Disclosed	n/a	n/a	n/a
106.	Disclosed	n/a	n/a	n/a

107.	Redacted	Art.23 Art.25	The redactions applied to the first email in this message were correctly applied. In respect of the second and third emails in the chain, see comments at PO104.	No.
108.	Withheld	NBC	This email has been appropriately withheld.	No.
109.	Withheld	NBC	This email has been appropriately withheld.	No.
110.	Withheld	NBC	This email has been appropriately withheld.	No.
111.	Redacted	Art.25	See IG161.	No.
112.	Withheld	NBC	This email has been appropriately withheld.	No.
113.	Disclosed	n/a	n/a	n/a
114.	Redacted	Art.25	It is noted that the SPA has indicated that it will not seek to maintain reliance on an exemption under Art.25 in respect of the names of serving members of the States.	Yes. SPA to review email and disclose email with names of serving States members un-redacted.
115.	Redacted	Art.25	See PO114.	Yes. SPA to review email and disclose email with names of serving States members un-redacted.

116.	Redacted	NBC	It is noted that the SPA has indicated that it will not seek to maintain reliance on an exemption under Art.25 in respect of the names of serving members of the States.	Yes. SPA to review email and disclose email with names of serving States members un-redacted.
117.	Redacted	Art.25	It is noted that the SPA has indicated that it will not seek to maintain reliance on an exemption under Art.25 in respect of the names of serving members of the States.	Yes. SPA to review email and disclose email with names of serving States members un-redacted.
118.	Redacted	Art.25	This email has been appropriately redacted.	No.
119.	Disclosed	n/a	n/a	n/a
120.	Withheld	NBC	This email has been appropriately withheld.	No.
121.	Withheld	NBC	This email has been appropriately withheld.	No.
122.	Withheld	NBC	This email has been appropriately withheld.	No.
123.	Redacted	Art.23	See IG179.	See IG179.
124.	Redacted	NBC	Inconsistency of approach displayed by the SPA as the email was only cc'd to certain members of the COM. The SPA has also indicated that it will not seek to maintain its reliance on the exemption in respect of serving members of the States.	Yes. SPA to review email and disclose email with names of serving States members un-redacted.
125.	Redacted	Art.23	See IG188.	See IG188.

126.	Redacted	Art.25	This email has been appropriately redacted.	No.
127.	Redacted	Art.23 Art.25 Art.41	This email has been appropriately redacted.	No.
128.	Redacted	Art.25	See IG194	See IG194
129.	Disclosed	n/a	n/a	n/a
130.	Redacted	NBC	This email has been appropriately redacted.	No.
131.	Redacted	Art.23 Art.25 Art.41	See AG84.	See AG84.
132.	Redacted	NBC	This email has been over-redacted as it was cc'd to a member of the COM and also other serving members of the States.	Yes. SPA to review email and provide appropriately redacted version.
133.	Redacted	NBC	This email has been appropriately withheld.	No.
134.	Redacted	NBC	This email has been over-redacted as it was cc'd to a member of the COM and also other serving members of the States.	Yes.

				SPA to review email and provide appropriately redacted version (taking into account any other exemptions upon which the SPA may seek to rely).
135.	Redacted	Art.23 Art.25	See IG200 and IG202.	See IG200 and IG202.
136.	Redacted	NBC	This email has been appropriately redacted.	No.
137.	Redacted	Art.23 Art.25.	See PO135.	See PO135.
138.	Disclosed	n/a	n/a	n/a
139.	Disclosed	n/a	n/a	n/a
140.	Disclosed	n/a	n/a	n/a
141.	Redacted	Art.23 Art.25	See IG208.	See IG208.
<u>File "Redacted Remaining Emails"</u>				
<u>Tab 3 = Emails from Philip Bailhache</u>				
1.	Redacted	NBC	This email has been appropriately redacted.	No.

2.	Redacted	Art.23 Art.25	The SPA no longer seeks to rely on the Art.25 exemption as email has been disclosed elsewhere without redactions.	No.
3.	Redacted	NBC	This email has been appropriately redacted.	No.
4.	Redacted	Art.25	This email has been appropriately redacted.	No.
5.	Disclosed	n/a	n/a	n/a
6.	Redacted	NBC	This email has been appropriately redacted.	No.
7.	Redacted	Art.25	This email has been appropriately redacted.	No.
8.	Redacted	Art.23 Art.25	The SPA no longer seeks to rely on the Art.25 exemption as email has been disclosed elsewhere without redactions.	No.
9.	Redacted	NBC	See IG18.	See 1G18.
10.	Redacted	NBC	This email has been appropriately redacted.	No.
11.	Redacted	Art.24 Art.25 Art.32	See IG35.	See IG35.
12.	Redacted	NBC	This email has been appropriately redacted.	No.
13.	Redacted	NBC	See IG31.	See IG31.

14.	Redacted	NBC	This email has been appropriately redacted.	No.
15.	Redacted	NBC	This email has been appropriately redacted.	No.
16.	Redacted	Art.25	This email has been appropriately redacted.	No.
17.	Redacted	Art.25	This email has been appropriately redacted.	No.
18.	Redacted	NBC	This email has been appropriately redacted.	No.
19.	Redacted	NBC	Email exchange between PO and PB has been inappropriately redacted and should be disclosed. The remainder of the email chain is from a third party and has been appropriately withheld.	Yes. Disclose the first email in the chain as between PO and PB.
20.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
21.	Withheld	NBC	This email has been appropriately withheld.	No.
22.	Disclosed	n/a	n/a	n/a
23.	Withheld	NBC	This email has been appropriately withheld.	No.
24.	Withheld	NBC	This email has been appropriately withheld.	No.
25.	Redacted	Art.25	This email has been over-redacted in light of the SPA's subsequent comments regarding serving members of the States. The name of the recipient to the email has been appropriately redacted.	Yes. Provide a copy of the email with the names of the serving States'

				members in unredacted form and the main body of the email also to be provided save for the name of the third party staff member to whom the email was sent.
26.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
27.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
28.	Redacted	NBC	See comments for IG41	See comments for IG41
29.	Withheld	NBC	This email has been appropriately redacted.	No.
30.	Disclosed	n/a	n/a	n/a
31.	Disclosed	n/a	n/a	n/a
32.	Disclosed	n/a	n/a	n/a
33.	Disclosed	n/a	n/a	n/a
34.	Disclosed	n/a	n/a	n/a
35.	Redacted	Art.23 Art.25	See IG104 and PO67.	See IG104 and PO67.

36.	Disclosed	n/a	n/a	n/a
37.	Withheld	NBC	This email has been appropriately withheld.	No.
38.	Withheld	NBC	This email has been appropriately withheld.	No.
39.	Withheld	NBC	This email has been appropriately withheld.	No.
40.	Redacted	NBC	See PO81.	See PO81.
41.	Withheld	NBC	This email has been appropriately withheld.	No.
42.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
43.	Redacted	Art.23 Art.25	See IG148.	See IG148.
44.	Redacted	Art.23 Art.25	See IG154 and PO 97.	See IG154 and PO97.
45.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
46.	Disclosed	n/a	n/a	n/a
47.	Withheld	NBC	This email has been appropriately redacted.	No.

48.	Redacted	Art.23 Art.25	See PO107. This email has been appropriately redacted.	No.
49.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
50.	Redacted	Art.23 Art.25	See IG172 and PO117.	No.
51.	Disclosed	n/a	n/a	n/a
52.	Withheld	NBC	This email has been appropriately redacted.	No.
53.	Withheld	NBC	This email has been appropriately redacted.	No.
54.	Redacted	Art.23 Art.25	See IG49.	See IG49.
55.	Redacted	Art.23. Art.25	See PO127.	See PO127.
56.	Withheld	NBC	This email has been appropriately redacted.	No.
57.	Redacted	Art.25	See AG84.	See AG84.

58.	Redacted	Art.25	See IG200. PB58 relates to the same email but has received slightly different redaction treatment to IG200 in that the name of PR has been redacted in PB58 but left unredacted in IG200. Similarly, the remainder of the email PB58 has been more heavily redacted than IG200. That being said, IG200 has been appropriately redacted and provided to the applicant.	No.
59.	Redacted	Art.23 Art.25	See IG202 and PO135.	See IG202 and PO135.
60.	Redacted	NBC	See PO203.	See PO203.
<u>Tab 4 = Emails from Alan Maclean</u>				
1.	Redacted	Art.23 Art.25	See IG3.	SeeIG3.
2.	Withheld	NBC	This email has been appropriately withheld.	No.
3.	Withheld	NBC	This email has been appropriately withheld.	No.
4.	Redacted	Art.25 Art.35	The SPA originally provided a redacted version of this email but have reviewed the position and provided a further version of the email, which redactions are now considered by the Commissioner to be appropriate.	No.

5.	Redacted.	Art.23 Art.25	See PB4.	See PB4.
6.	Disclosed	n/a	n/a	n/a
7.	Redacted.	Art.23 Art.25	See PB7.	See PB7.
8.	Redacted.	NBC	This email has been appropriately redacted.	No.
9.	Withheld	NBC	See PO17 which is a copy of AM9. PO17 has been disclosed in redacted form whereas AM9 has purportedly been withheld in its entirety demonstrating an inconsistency in approach by the SPA. See PO17.	See PO17.
10.	Withheld	NBC	See IG20.	See IG20.
11.	Withheld	NBC	This email has been over-redacted in that it was cc'd to IG and was sent to a serving member of the States but their names and email addresses have been redacted. The main body of the email has been appropriately redacted, however.	No.
12.	Withheld	NBC	This email has been over-redacted in that AM's name has been redacted despite the email being cc'd to him. However, the remainder of the email has been appropriately redacted.	No.

13.	Redacted	Art.23 Art.25.	See IG49.	See IG49.
14.	Withheld	NBC	See IG57.	See IG57.
15.	Disclosed	n/a	n/a	n/a
16.	Withheld	NBC	This email was cc'd to AM by PR yet AM's name and email address has been redacted. The remainder of the email has been appropriately withheld.	
17.	Disclosed	n/a	n/a	n/a
18.	Redacted	Art.23 Art.25	See AG40. The SPA is not, however, maintaining reliance on the exemption.	See AG40.
19.	Disclosed	n/a	n/a	n/a
20.	Withheld	NBC	See IG80.	See IG80.
21.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
22.	Withheld	NBC	This email has been appropriately withheld.	No.
23.	Withheld	NBC	This email has been appropriately withheld.	No.

24.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
25.	Withheld	NBC	Save for that the names of certain serving COM members/States members have been redacted but to whom the email was cc'd, the remainder of the email has been appropriately redacted.	No.
26.	Disclosed	n/a	n/a	n/a
27.	Disclosed	n/a	n/a	n/a
28.	Disclosed	n/a	n/a	n/a
29.	Disclosed	n/a	n/a	n/a
30.	Disclosed	n/a	n/a	n/a
31.	Disclosed	n/a	n/a	n/a
32.	Disclosed	n/a	n/a	n/a
33.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
34.	Withheld	NBC	This email has been appropriately withheld.	No.
35.	Withheld	NBC	Save for that the names of certain serving COM members/States members have been redacted but to whom the email was cc'd, the remainder of the email has been appropriately redacted.	No.

36.	Disclosed	n/a	n/a	n/a
37.	Withheld	NBC	This email has been appropriately withheld.	No.
38.	Disclosed	n/a	n/a	n/a
39.	Withheld	NBC	This email has been appropriately withheld.	No.
40.	Redacted	Art.25	This email has been appropriately redacted.	No.
41.	Disclosed	n/a	n/a	n/a
42.	Redacted	Art.25	This email has been appropriately redacted.	No.
43.	Disclosed	n/a	n/a	n/a
44.	Redacted	Art.25	This email has been appropriately redacted.	No.
45.	Redacted	Art.23	See IG149.	See IG149.
46.	Redacted	Art.23	See IG152.	See IG152.
47.	Disclosed	n/a	n/a	n/a
48.	Disclosed	n/a	n/a	n/a
49.	Redacted	Art.23	See IG162.	See IG162.
50.	Disclosed	n/a	n/a	n/a
51.	Disclosed	n/a	n/a	n/a

52.	Redacted	Art.25	SPA has indicated in its response that the recipients to the email need not have been redacted.	Yes. Email to be provided without redactions.
53.	Disclosed	n/a	n/a	n/a
54.	Redacted	Art.25	SPA has indicated that this email has been withheld on the basis of NBC but it has, however, been disclosed albeit in slightly redacted form. See IG171.	See IG171.
55.	Disclosed	n/a	n/a	n/a
56.	Disclosed	n/a	n/a	n/a
57.	Withheld	NBC	This email has been appropriately withheld.	No.
58.	Disclosed	n/a	n/a	n/a
59.	Disclosed	n/a	n/a	n/a
60.	Redacted	Art.25 Art.39	In respect of the redactions applied to such information falling under Art.25, those redactions have been applied appropriately. Art.39 is a qualified exemption and the information can thus only be withheld if the public interest in maintaining the exemption outweighs the public interest in disclosure. The SPA has explained the rationale for seeking to rely on Art.39 and the Commissioner accepts that rationale.	No.

61.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
62.	Withheld	NBC	This email has been appropriately withheld.	No.
63.	Redacted	Art.23 Art.25	See IG194.	See IG194.
64.	Redacted	Art.23	See AG84	See AG84.
65.	Redacted	Art.23	See PO134 and PO135.	See PO134 and PO135.
66.	Disclosed	n/a	n/a	n/a
67.	Redacted	Art.25	See AG65.	No.
68.	Redacted	Art.25	See AG67.	No.

Tab 5 = Emails from Andrew Green

1.	Withheld	NBC	This email has been appropriately withheld.	No.
2.	Redacted	Art.23	See IG11.	See IG11.
3.	Redacted.	Art.23 Art.25	See PO26. This email has been appropriately redacted.	See PO26. No.
4.	Withheld	NBC	This email has been appropriately withheld.	No.

5.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
6.	Redacted	Art.23 Art.25	This email has been appropriately redacted and the SPA has indicated that the attachment will be provided to the complainant.	No.
7.	Redacted	Art.23 Art.25	See IG9.	See IG9.
8.	Redacted	Art.23 Art.25	See IG11.	See IG11.
9.	Redacted	NBC	This email has been appropriately withheld.	No.
10.	Withheld	NBC	This email has been appropriately withheld.	No.
11.	Redacted	NBC	See IG18.	See IG18.
12.	Withheld	NBC	This email has been appropriately withheld.	No.
13.	Withheld	NBC	This email has been appropriately withheld.	No.
14.	Withheld	NBC	See PO22.	See PO22.
15.	Withheld	NBC	This email has been appropriately withheld.	No.
16.	Withheld	NBC	This email has been appropriately withheld.	No.

17.	Redacted	Art.25	This email has been appropriately redacted.	No.
18.	Redacted	Art.25	The name of PR has been redacted as a recipient to the email. Otherwise, the remainder of the email has been appropriately redacted.	No.
19.	Withheld	NBC	This email has been appropriately withheld.	
20.	Disclosed	n/a	n/a	n/a
21.	Redacted	NBC	Whilst the SPA seeks to assert that this email is not disclosable by virtue of it being out of scope and has thus redacted the names of the recipients to the email, subject, date and time, the SPA has gone on to disclose the main body of the email. The Commissioner has thus considered whether or not the redactions applied to the recipients of the email falls within Art.25. The remainder of the email has been appropriately redacted.	No.
22.	Disclosed	n/a	n/a	n/a
23.	Withheld	NBC	This email has been appropriately withheld.	This email has been appropriately withheld.
24.	Withheld	NBC	This email has been appropriately withheld.	This email has been appropriately withheld.
25.	Withheld	NBC	This email has been appropriately withheld.	This email has been appropriately withheld.

26.	Disclosed	n/a	n/a	n/a
27.	Redacted	Art.25	PR's name has been redacted which is inconsistent with AG26 where his name has been left unredacted in respect of the same email chain.	No.
28.	Redacted	Art.25	See AG27.	No.
29.	Redacted	Art.25	See AG30 where this email is replicated with PR's name has been left unredacted.	No.
30.	Disclosed	n/a	n/a	n/a
31.	Disclosed	n/a	n/a	n/a
32.	Disclosed	n/a	n/a	n/a
33.	Redacted	Art.25	PR's name has been redacted as a recipient to this email. Inconsistent policy applied by SPA. The remainder of the email has disclosed.	No.
34.	Redacted	Art.25	PR's name has been redacted as a recipient to this email. Inconsistent policy applied by SPA. The remainder of the email has disclosed.	No.
35.	Redacted	Art.25	PR's name has been redacted as a recipient to this email. Inconsistent policy applied by SPA. The remainder of the email has disclosed.	No.
36.	Redacted	Art.25	PR's name has been redacted as a recipient to this email. Inconsistent policy applied by SPA. The remainder of the email has disclosed.	No.
37.	Redacted	Art.25	This email has been appropriately redacted.	No.

38.	Redacted	Art.25	PR's name has been redacted as a recipient to this email. Inconsistent policy applied by SPA. The remainder of the email has disclosed.	No.
39.	Redacted	Art.25	EN and PR's names have been redacted as a recipient to this email. Inconsistent policy applied by SPA. The remainder of the email has disclosed.	No.
40.	Redacted	Art.25	This email has been appropriately redacted.	No.
41.	Disclosed	n/a	n/a	n/a
42.	Redacted	Art.25	EN and PR's names have been redacted as a recipient to this email. Inconsistent policy applied by SPA. The remainder of the email has disclosed.	No.
43.	Redacted	Art.23 Art.25 Art.34	<p>The SPA has indicated that it will not maintain its reliance on Art.25 in respect of the names of serving States members and that a further version of this email will be provided to the complainant.</p> <p>In respect of the parts of the email which have been redacted and to which the Art.34 exemption has been applied (the economy), the Commissioner has considered the rationale put forward by the SPA in respect of their reliance on this provision.</p> <p>Art.34 is a qualified exemption and the information can thus only be withheld if the public interest in maintaining the exemption outweighs the public interest in disclosure.</p> <p>The Commissioner considers that the redactions applied by the SPA are appropriate.</p>	No.

44.	Redacted		<p>The SPA has indicated that this email has been provided in full but it has, in fact, been redacted to remove EN and PR's names and to identify them as recipients to the email (information cc'd).</p> <p>The remainder of the email has been disclosed in full.</p>	No.
45.	Redacted		<p>The SPA has indicated that this email has been provided in full but it has, in fact, been redacted to remove EN and PR's names and to identify them as recipients to the email (information cc'd).</p> <p>The remainder of the email has been disclosed in full.</p>	No.
46.	Redacted	Art.25	See AG43.	See AG43.
47.	Redacted		<p>The SPA has indicated that this email has been disclosed in full but, in fact, it has been provided in redacted form with the names of PR and EN redacted.</p> <p>Further evidence of inconsistent redaction policy being applied by the SPA (particularly in light of AG48).</p>	<p>Yes.</p> <p>SPA to provide unredacted version of email.</p>
48.	Disclosed	n/a	n/a	n/a
49.	Redacted		<p>The SPA has indicated that this email has been disclosed in full but, in fact, it has been provided in redacted form with the name of an elected States Member redacted.</p>	<p>Yes.</p> <p>SPA to provide unredacted version of email.</p>
50.	Redacted		<p>The SPA has indicated that this email has been disclosed in full but, in fact, it has been provided in redacted form with the name of an elected States Member redacted.</p>	Yes.

				SPA to provide unredacted version of email.
51.	Redacted		The SPA has indicated that this email has been disclosed in full but, in fact, it has been provided in redacted form with the name of an elected States Member redacted.	Yes. SPA to provide unredacted version of email.
52.	Redacted		The SPA has indicated that this email has been disclosed in full but, in fact, it has been provided in redacted form with the name of an elected States Member redacted.	Yes. SPA to provide unredacted version of email.
53.	Redacted		The SPA has indicated that this email has been disclosed in full but, in fact, it has been provided in redacted form with the name of an elected States Member redacted.	Yes. SPA to provide unredacted version of email.
54.	Redacted		The SPA has indicated that this email has been disclosed in full but, in fact, it has been provided in redacted form with the name of an elected States Member redacted.	Yes. SPA to provide unredacted version of email.
55.	Redacted		The SPA has indicated that this email has been disclosed in full but, in fact, it has been provided in redacted form with the name of an elected States Member redacted.	Yes. SPA to provide unredacted version of email.
56.	Redacted	NBC	The SPA has indicated that this email has been withheld on the basis that it is NBC but it has, in fact, been disclosed albeit in slightly redacted form.	No. This on the basis that notwithstanding the redactions, it

			The SPA has apparently redacted certain names on the basis that the individual is not on the COM but that individual's email address has been left un-redacted and it is clear who that individual is.	is clear as to the identity of that third party.
57.	Redacted	Art.23 Art.25	See PO82.	See PO82.
58.	Withheld	NBC	This email has been appropriately withheld.	No.
59.	Redacted		The SPA has indicated that this email has been disclosed in full but, in fact, the names of certain serving States Members have been redacted. This is also inconsistent with other emails which have been disclosed.	See AG48.
60.	Redacted		The SPA has indicated that this email has been disclosed in full but, in fact, the names of certain serving States Members have been redacted. This is also inconsistent with other emails which have been disclosed.	See AG48.
61.	Redacted	Art.23 Art.25	See IG143.	See IG143.
62.	Redacted	Art.23 Art.25	Name of PR has been redacted. The remainder of the email has been appropriately redacted.	No.
63.	Withheld	NBC	This email has been appropriately withheld.	No.

64.	Redacted	Art.23 Art.25	See IG143.	See IG143.
65.	Redacted	Art.23 Art.25	This email has been appropriately redacted.	No.
66.	Disclosed	n/a	n/a	n/a
67.	Disclosed	n/a	n/a	n/a
68.	Disclosed	n/a	n/a	n/a
69.	Redacted	Art.23 Art.25	See PO97.	See PO97.
70.	Redacted	Art.23 Art.25	See IG155.	See IG155.
71.	Disclosed	n/a	n/a	n/a
72.	Disclosed	n/a	n/a	n/a
73.	Disclosed	n/a	n/a	n/a
74.	Redacted		In their supporting information, the SPA has indicated that this email has been provided in unredacted format, elsewhere.	No.

75.	Redacted		See AG74.	See AG74.
76.	Redacted		See AG74.	See AG74.
77.	Redacted	Art.23 Art.25	The SPA has redacted the names of certain serving States members indicating that their names do not warrant redaction. This is inconsistent with certain of the redactions applied at IG171 and PO116 and also with certain of the SPA's comments as provided to the Commissioner.	Yes. Email to be provided with the names of serving States members unredacted.
78.	Redacted	Art.23 Art.25 Art.39	See AM60.	See AM60.
79.	Redacted	Art.23 Art.25	Save for that the name of EN has been redacted, the remainder of the email has been appropriately redacted.	No.
80.	Disclosed	n/a	n/a	n/a
81.	Redacted	Art.23 Art.25	See IG194.	See IG194.
82.	Disclosed	n/a	n/a	n/a
83.	Disclosed	n/a	n/a	n/a
84.	Redacted	Art.23	LF's name has been redacted.	No.

		Art.25 Art.41	Save for that and one further small redaction in respect of a third party, the email has been disclosed in full.	
<u>Tab 6 = Emails from Rob Duhamel</u>				
1.	Redacted	Art.35	Save for saying that the Art.35 exemption was being relied upon, no rationale has been given for such. The Commissioner considers that in the absence of any cogent reasons for the SPA seeking to rely on that exemption that, on balance, Art.35 is not engaged.	Yes. SPA to provide unredacted version of email.
2.	Redacted	Presumably Art.25 although this is not clear.	This email has been appropriately redacted.	No.
3.	Redacted	Presumably Art.25 although this is not clear.	This email has been appropriately redacted.	No.
4.	Disclosed	n/a	n/a	n/a
5.	Disclosed	n/a	n/a	n/a
6.	Disclosed	n/a	n/a	n/a

7.	Disclosed	n/a	n/a	n/a
<u>Tab 7 = Emails from Francis Le Gresley</u>				
1.	Withheld	NBC	This email has been appropriately withheld.	No.
2.	Redacted	Art.23 Art.25	See IG85.	See IG85.
3.	Disclosed	n/a	n/a	n/a
4.	Redacted	Art.23 Art.25	See IG103.	See IG103.
5.	Redacted	Art.23 Art.25	See IG111.	See IG111.
6.	Redacted	Art.23	See IG194.	See IG194.
7.	Redacted	Art.23	See PO100.	See PO100.
8.	Disclosed	n/a	n/a	n/a
9.	Redacted	Art.23	See PO103.	See PO103.
10.	Withheld	NBC	This email has been appropriately withheld.	No.
<u>Tab 8 = Emails from Ian Le Marquand</u>				

1.	Redacted	Art.23 Art.25 Art.31	See IG35.	See IG35.
2.	Redacted	Art. 25	This email has been over-redacted in that the names of certain individuals who were on the COM at the time or who were/are now serving members of the States have been redacted (but to whom the email was cc'd). The SPA has indicated that it would not seek to rely on the Art.25 exemption in respect of such individuals. The remainder of the email has, however, been appropriately redacted.	No.
3.	Disclosed	n/a	n/a	n/a
4.	Disclosed	n/a	n/a	n/a
5.	Redacted	Art.25	See ILM2.	See ILM2.
6.	Redacted	NBC	This email has been over-redacted in that the names of certain individuals who were on the COM at the time or who were/are now serving members of the States have been redacted (but to whom the email was cc'd). The Commissioner considers that it is artificial to suggest that the email was not "to" certain members of the COM when they were clearly cc'd.	Yes. SPA to provide email with names of those who were on COM at the time and who were/are now serving members of the States un-redacted.
7.	Disclosed	n/a	n/a	n/a

8.	Redacted	NBC	<p>This email has been over-redacted in that the names of certain individuals who were on the COM at the time or who were/are now serving members of the States have been redacted (but to whom the email was cc'd).</p> <p>The Commissioner considers that it is artificial to suggest that the email was not "to" certain members of the COM when they were clearly cc'd.</p>	<p>Yes.</p> <p>SPA to provide email with names of those who were on COM at the time and who were/are now serving members of the States un-redacted.</p>
9.	Redacted	Art.25	<p>This email has been over-redacted in that the names of certain individuals who were on the COM at the time or who were/are now serving members of the States have been redacted (but to whom the email was cc'd).</p> <p>The Commissioner considers that it is artificial to suggest that the email was not "to" certain members of the COM when they were clearly cc'd.</p> <p>The remainder of the email has been appropriately redacted.</p>	<p>Yes.</p> <p>SPA to provide email with names of those who were on COM at the time and who were/are now serving members of the States un-redacted.</p>
10.	Redacted	Art.25	<p>This email has been over-redacted in that the names of certain individuals who were on the COM at the time or who were/are now serving members of the States have been redacted (but to whom the email was cc'd).</p> <p>The Commissioner considers that it is artificial to suggest that the email was not "to" certain members of the COM when they were clearly cc'd.</p> <p>The remainder of the email has been appropriately redacted.</p>	<p>Yes.</p> <p>SPA to provide email with names of those who were on COM at the time and who were/are now serving members of the States un-redacted.</p>

11.	Redacted	Art.23	See PO31.	See PO31.
<u>Tab 9 = Emails from Kevin Lewis</u>				
1.	Redacted	Art.23 Art.25	See IG11.	See IG11.
2.	Redacted	Art.23 Art.25	See PR02.	No.
3.	Redacted	NBC	This email has been appropriately redacted.	No.
4.	Redacted	NBC	This email has been appropriately redacted.	No.
5.	Redacted	NBC	This email has been appropriately redacted.	No.
6.	Redacted	Art.23 Art.25	See IG11.	See IG11.
7.	Redacted	Art.25	This email has been appropriately redacted.	No.
8.	Disclosed	n/a	n/a	n/a
9.	Disclosed	n/a	n/a	n/a
10.	Redacted	Art.25	This email has been appropriately redacted.	No.
11.	Redacted	Art.25	This email has been appropriately redacted.	No.

12.	Redacted	Art.25	This email has been appropriately redacted.	No.
13.	Redacted	Art.23 Art.25	This email has been over-redacted in that the names of certain individuals who were on the COM at the time or who were/are now serving members of the States have been redacted. The SPA has indicated that it would not seek to rely on the Art.25 exemption in respect of such individuals. This email has been disclosed in full elsewhere.	No. See IG90 and PO64
14.	Redacted	NBC	This email has been appropriately redacted.	No.
15.	Redacted	NBC	This email has been appropriately redacted.	No.
16.	Redacted	NBC	This email has been appropriately redacted.	No.
17.	Redacted	NBC	This email has been appropriately redacted.	No.
18.	Redacted	NBC	This email has been appropriately redacted.	No.
19.	Redacted	NBC	This email has been appropriately redacted.	No.
20.	Disclosed	n/a	n/a	n/a
21.	Redacted	Art.25	This email has been appropriately redacted.	No.
22.	Redacted	NBC	This email has been over-redacted in that the names of certain individuals who were on the COM at the time or who were/are now serving members of the States have been redacted. The SPA has indicated that it would not seek to rely on the Art.25 exemption in respect of such individuals.	Yes. SPA to provide un-redacted version of email.

23.	Disclosed	n/a	n/a	n/a
24.	Disclosed	n/a	n/a	n/a
<u>Tab 10 = Emails from Patrick Ryan</u>				
1.	Redacted	Unclear. Presumably Art.25	This email has been appropriately redacted.	No.
2.	Withheld	NBC	This email has been over-redacted insofar as that it was cc'd to certain other members of the COM and serving members of the States and those names have been redacted. The remainder of the message has been appropriately redacted, however.	No.
3.	Withheld	NBC	This email has been over-redacted insofar as that it was cc'd to another member of the COM whose name was redacted. The remainder of the message has been appropriately redacted, however.	No.
4.	Disclosed	n/a	n/a	n/a