

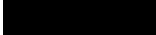
RE: FOI 23/958

MHRA Customer Services <MHRACustomerServices@mhra.gov.uk>

Thu 11/01/2024 18:49

To

 2 attachments (3 MB)

 correspondence chain with redactions.docx; Anaphylaxis CLARK Dec 19 2020 Final AR.pptx;

Dear 

**Our reference FOI 23/958**

Thank you for your message of 10 December requesting the following:

*For the period 1 October 2020 to 31 December 2020 email correspondence:*

*From/to Jamie Convisser and Jonathan Mogford*

*From/to Amanda Cohn*

I can confirm that we do hold information relevant to your request which is attached in the Word document and slide presentation.

You will see that some information has been withheld under s40(2) of the FOIA (personal information). This is because it contains third party personal data disclosure of which would breach one or more of the data protection principles. The Agency is satisfied that disclosure here would breach the first data protection principle, in particular the requirement of fairness on the basis that disclosure would not be reasonably expected by the third parties. Section 40 is an absolute exemption and does not require the application of the public interest test.

You will also note that we have not included an attachment sent by the FDA to Jamie Convisser on 23 December 2020. This is because it was part of a separate chain of correspondence that did not include Amanda Cohn. Although you can request this information, we may be unable to disclose it under one of the exemptions in the FOIA.

If you have a query about the information provided, please reply to this email.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date you receive this response and addressed to: [info@mhra.gov.uk](mailto:info@mhra.gov.uk)

Please remember to quote the reference number above in any future communications.

If you were to remain dissatisfied with the outcome of the internal review, you would have the right to apply directly to the Information Commissioner for a decision. Please bear in mind that the Information Commissioner will not normally review our handling of your request unless you have first contacted us to conduct an internal review. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Yours sincerely,

**MHRA Customer Experience Centre**

Communications and engagement  
Medicines and Healthcare products Regulatory Agency  
10 South Colonnade, Canary Wharf, London E14 4PU

**From:** [REDACTED] >  
**Sent:** Sunday, December 10, 2023 5:30 PM  
**To:** MHRA Customer Services <[MHRACustomerServices@mhra.gov.uk](mailto:MHRACustomerServices@mhra.gov.uk)>  
**Subject:** FOI 23/958 - request for email correspondence

Dear MHRA FOI Team,

I do confirm that this request is for the same time frame as agreed for FOI 23/518 – the period 1st October 2020 to 31st December 2020, and that the request continues to focus on correspondence to and from Jamie Convisser and Jonathan Mogford

I need all emails sent to and received from Amanda Cohn

Best Regards,

[REDACTED]

Le 10/12/2023 à 11:36, MHRA Customer Services a écrit :

Dear [REDACTED]

My apologies, we need to clarify three points with you before we can proceed with this request.

Firstly, can you confirm please that this request is for the same time frame as agreed for FOI 23/518 – the period 1<sup>st</sup> October 2020 to 31<sup>st</sup> December 2020, and that the request continues to focus on correspondence to and from Jamie Convisser and Jonathan Mogford.

For Amanda Cohn [REDACTED] you've mentioned her only as a "recipient". Can you please advise whether:

- you *only* wish for emails *sent to* Amanda Cohn (as a recipient), or

- if you were *also* wanting the request to include any emails *sent to* Jamie Convisser/Jonathan Mogford *by* Amanda Cohn (as a sender as well as a recipient).

If your answer to the above is yes to the first question, and you do wish to include Amanda Cohn as both sender and recipient, then your request will be this:

*...for the time period from the 1st October 2020 to and including the 31st december 2020, would you be able to provide all emails from/to :*

- *Jamie Convisser* [REDACTED]
- *Jonathan Mogford* [REDACTED]

*from/to :*

- *Amanda Cohn* [REDACTED]

If you are only interested in emails sent *to* Amanda, then the last part will simply be:

*to :*

- *Amanda Cohn* [REDACTED]

I'm sorry that the above wasn't quite clear from your reply of 26 November. Once you have confirmed these points, we'll be able to proceed with a new request.

Thank you for help with this.

Yours sincerely

[REDACTED]

[REDACTED]

**MHRA Customer Experience Centre**

Communications and engagement team

Medicines and Healthcare products Regulatory Agency

10 South Colonnade, Canary Wharf, London E14 4PU

**From:** [REDACTED]

**Sent:** Sunday, November 26, 2023 3:07 PM

**To:** MHRA Customer Services <[MHRACustomerServices@mhra.gov.uk](mailto:MHRACustomerServices@mhra.gov.uk)>

**Cc:** [REDACTED]

**Subject:** Re: FOI 23/518 - request for email correspondence

Dear MHRA Customer Services,

Can we limit the scope to one recipient : Amanda Cohn [REDACTED]

Best Regards

[REDACTED]

Le 26/11/2023 à 15:42, MHRA Customer Services a écrit :

Dear [REDACTED]

I wrote to you in October about a request you had made for correspondence (FOI 23/723) and we were able to agree a way to reduce the scope of that request to a more manageable amount of correspondence. I hope that we will be able to reach a similar agreement for this request, FOI 23/518.

I am sorry that I did not write to you sooner about this. I was aware that this request asked for a large amount of information and that colleagues have been working on it for some months, but I was only more recently asked to review this progress. I understand that this request was a smaller version of your previous request FOI 23/331. I've included that original request, and the MHRA's response to it, in the email chain below.

I appreciate that after we had refused FOI 23/331, you did try to narrow your new request, and you specified a three-month time frame to reduce the initial size. However, I am sorry to now write and explain that, even with the three-month time frame you've given, FOI 23/518

still asks for too great an amount of information, and we must therefore refuse it as section 14(1) still applies to this request. I will explain why below.

FOI 23/518 asked:

*...for the time period from the 1st October 2020 to and including the 31st december 2020, would you be able to provide all emails from/to :*

- *Jamie Convisser* [REDACTED]
- *Jonathan Mogford* [REDACTED]

*from/to :*

- *Philip Krause* [REDACTED]
- *Marion Gruber* [REDACTED]
- *Peter Marks* [REDACTED]
- *Janet Woodcock* [REDACTED]
- *Amanda Cohn* [REDACTED]

The 4,589 emails that were originally in scope of FOI 23/331 was reduced to approximately 700 emails by our searches, but each email retrieved in the searches then needs to be reviewed firstly to determine if it is relevant, and then to consider whether the information may be disclosed. The burden created by these activities is still estimated to exceed 55 hours. The key reason so many emails have been located by our IT searches is that you are asking about more than one member of MHRA staff and a number of external parties over a three month period. This meant we needed to conduct numerous searches for the people named to ensure that we captured all the relevant exchanges. However, this has created a large number of results, many of which contain duplicated information (if a number of those named are involved in the same chain). We then need to manually review each email individually to ensure all distinct exchanges are correctly identified, before the further review of all the relevant information, to determine if it may be disclosed.

I wonder if our response to FOI 23/331 could have provided some more advice to you about how to narrow your request, so I will seek to do this here.

I can make suggestions about how you may be able to describe and focus a request on a specific amount of smaller information:

- I would recommend that you reduce the scope by limiting the request in the first instance to one member of MHRA staff only, and to one external sender/recipient.
- I wonder if it may help to look at some information which was previously disclosed by the FDA, which is available on this link: <https://www.judicialwatch.org/wp-content/uploads/2023/02/JW-v-HHS-COVID-Vaccines-Feb-2022-00660.pdf>.
  - It may help to review this available information and if this is the type of correspondence you are looking for, identify if there is a specific email or a small number of emails that you are interested in. If so, please indicate this by referring to the date and time.
  - If you are able to identify a specific email or email chain that you are interested in, we will then be able to focus on this. A specific date will be very helpful here to focus the request.
- I can see that in their disclosure, the FDA applied exemptions to some information, so I should advise that as usual, once we have identified and retrieved the information, as usual we will then need to consider whether any exemptions under the UK FOIA legislation apply or whether it may be disclosed.
- It may be helpful if you can also give any details of the specific subject or topic that you are looking for information about. In some cases, this may help us to introduce key words to our searches, which in some cases could also assist in reducing the number of search results.

In general, the best way to move this request away from catching large numbers of emails, and bring it within manageable limits, would be to focus on more specific information, so that we can progress a smaller request as a starting point – as always, you will be able to make a future request if a disclosure highlights something that you may then wish to follow up. I hope that these suggestions will be useful to help with this.

If it would help to discuss this further, please do let me know. You are welcome to contact me directly or via the Customer Services email address.

Once again, I apologise for the delay in issuing the response to this request.

Yours sincerely

[Redacted signature]

[Redacted name]

**MHRA Customer Experience Centre**

Communications and engagement team

Medicines and Healthcare products Regulatory Agency

10 South Colonnade, Canary Wharf, London E14 4PU

## Appeal Rights

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date you receive this response and addressed to: [info@mhra.gov.uk](mailto:info@mhra.gov.uk). If you remain dissatisfied after the internal review, you may ask the Information Commissioner for a decision: <https://ico.org.uk/make-a-complaint/foi-and-eir-complaints/foi-and-eir-complaints/>

**From:** [REDACTED]

**Sent:** Wednesday, July 12, 2023 5:28 PM

**To:** MHRA Customer Services <[MHRACustomerServices@mhra.gov.uk](mailto:MHRACustomerServices@mhra.gov.uk)>

**Subject:** FOI Request

Dear MHRA FOI Team,

This email represents a request under the terms of the Freedom of Information Act 2000, for the time period from the 1st October 2020 to and including the 31st december 2020, would you be able to provide all emails from/to :

- Jamie Convisser [REDACTED]
- Jonathan Mogford [REDACTED]

from/to :

- Philip Krause [REDACTED]
- Marion Gruber [REDACTED]
- Peter Marks <[\[REDACTED\]](#)>
- Janet Woodcock [REDACTED]
- Amanda Cohn [REDACTED]

Best Regards,

[REDACTED]

**From:** MHRA Customer Services [MHRACustomerServices@mhra.gov.uk](mailto:MHRACustomerServices@mhra.gov.uk)

**Sent:** 12 July 2023 16:08

**To:** [REDACTED]

**Subject:** FOI 23/331 - FOI Request

**Our ref:** FOI 23/331

Dear [REDACTED]

Thank you for your request of 03 May 2023 under the Freedom of Information Act. Please accept our apologies for the delay in reply.

Your request was as follows:

This email represents a request under the terms of the Freedom of Information Act 2000, would you be able to provide all emails from/to :

- Jamie Convisser [REDACTED]
- Jonathan Mogford [REDACTED]

from/to :

- Philip Krause [REDACTED]
- Marion Gruber [REDACTED]
- Peter Marks [REDACTED]
- Janet Woodcock [REDACTED]
- Amanda Cohn [REDACTED]

We confirm that we hold the information you have requested. However, we consider that this information is exempt under Section 14 (1) of the Freedom of Information Act. Section 14 (1) does not oblige a public authority to comply with a request for information if the request is vexatious. As set out on the [Information Commissioner's Office \(ICO\) website](#), and we quote:

“Section 14(1) is designed to protect public authorities by allowing you to refuse any requests which have the potential to cause a disproportionate or unjustified level of disruption, irritation or distress.”

We are not applying Section 14 (1) lightly to your request, we have considered other options, but our background to applying Section 14 (1) is set out below.

On receipt of your request, we instructed our IT support team to conduct a search of our email records. That search has found a total of 4,589 emails in scope of your request. We would then need to:

- Download and review each email.
- Consider any exemptions that may apply to the information therein and apply redactions (noting this process includes converting each email into a format such as pdf and applying any required redactions at that stage).



- Discuss the release of information as appropriate with the third party (which could be any of the 5 non-MHRA individuals you have named).
- Compile the final releasable emails and share them with you.

If we were to allow 5 minutes per email for this activity, then we would be looking at approximately 382 hours to comply with your request.

In line with the ICO guidance we have considered applying Section 12, given that at this stage our concern is with the burden of fulfilling your request. However, the reason Section 12 is not appropriate in this case is because it cannot be claimed “for the cost and effort associated with considering exemptions or redacting exempt information.” As we have stated above, we have located the emails in question, it is the consideration of exemptions and the redaction process which we consider will take a significant amount of time and cause a significant burden.

We wish to draw your attention to the Information Commissioner’s [guidance for requestors](#), which advises against making “catch-all” requests.

We will be happy to consider any new request for more specific information, should you choose to make one.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date you receive this response and addressed to: [info@mhra.gov.uk](mailto:info@mhra.gov.uk)

Please remember to quote the reference number above in any future communications.

If you were to remain dissatisfied with the outcome of the internal review, you would have the right to apply directly to the Information Commissioner for a decision. Please bear in mind that the Information Commissioner will not normally review our handling of your request unless you have first contacted us to conduct an internal review. The Information Commissioner can be contacted at:

Information Commissioner’s Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Yours sincerely

## MHRA Customer Experience Centre

Communications and engagement team

Medicines and Healthcare products Regulatory Agency

10 South Colonnade, Canary Wharf, London E14 4PU

**From:** [REDACTED]  
**Sent:** Wednesday, May 3, 2023 8:19 AM  
**To:** MHRA Customer Services <[MHRACustomerServices@mhra.gov.uk](mailto:MHRACustomerServices@mhra.gov.uk)>  
**Subject:** FOI 23/331 - FOI Request

Dear MHRA FOI Team,

This email represents a request under the terms of the Freedom of Information Act 2000, would you be able to provide all emails from/to :

- Jamie Convisser [REDACTED]
- Jonathan Mogford [REDACTED]

from/to :

- Philip Krause [REDACTED]
- Marion Gruber [REDACTED]
- Peter Marks [REDACTED]
- Janet Woodcock [REDACTED]
- Amanda Cohn [REDACTED]

Best Regards,

[REDACTED]

DISCLAIMER This email and any files transmitted with it are confidential. If you are not the intended recipient, any reading, printing, storage, disclosure, copying or any other action taken in respect of this email is prohibited and may be unlawful. If you are not the intended recipient, please notify the sender immediately by using the reply function and then permanently delete what you have received. Incoming and outgoing email messages are routinely monitored for compliance with the Department of Health's policy on the use of electronic communications. For more information on the Department of Health's email policy, click [DHTermsAndConditions](#)

DISCLAIMER This email and any files transmitted with it are confidential. If you are not the intended recipient, any reading, printing, storage, disclosure, copying or any other action taken in respect of this email is prohibited and may be unlawful. If you are not the intended recipient, please notify the sender immediately by using the reply function and then permanently delete what you have received. Incoming and outgoing email messages are routinely monitored for compliance with the Department of Health's policy on the use of

electronic communications. For more information on the Department of Health's email policy, click [DHTermsAndConditions](#)

DISCLAIMER This email and any files transmitted with it are confidential. If you are not the intended recipient, any reading, printing, storage, disclosure, copying or any other action taken in respect of this email is prohibited and may be unlawful. If you are not the intended recipient, please notify the sender immediately by using the reply function and then permanently delete what you have received. Incoming and outgoing email messages are routinely monitored for compliance with the Department of Health's policy on the use of electronic communications. For more information on the Department of Health's email policy, click [DHTermsAndConditions](#)

DISCLAIMER This email and any files transmitted with it are confidential. If you are not the intended recipient, any reading, printing, storage, disclosure, copying or any other action taken in respect of this email is prohibited and may be unlawful. If you are not the intended recipient, please notify the sender immediately by using the reply function and then permanently delete what you have received. Incoming and outgoing email messages are routinely monitored for compliance with the Department of Health's policy on the use of electronic communications. For more information on the Department of Health's email policy, click [DHTermsAndConditions](#)

DISCLAIMER This email and any files transmitted with it are confidential. If you are not the intended recipient, any reading, printing, storage, disclosure, copying or any other action taken in respect of this email is prohibited and may be unlawful. If you are not the intended recipient, please notify the sender immediately by using the reply function and then permanently delete what you have received. Incoming and outgoing email messages are routinely monitored for compliance with the Department of Health's policy on the use of electronic communications. For more information on the Department of Health's email policy, click [DHTermsAndConditions](#)

DISCLAIMER This email and any files transmitted with it are confidential. If you are not the intended recipient, any reading, printing, storage, disclosure, copying or any other action taken in respect of this email is prohibited and may be unlawful. If you are not the intended recipient, please notify the sender immediately by using the reply function and then permanently delete what you have received. Incoming and outgoing email messages are routinely monitored for compliance with the Department of Health's policy on the use of electronic communications. For more information on the Department of Health's email policy, click [DHTermsAndConditions](#)

DISCLAIMER This email and any files transmitted with it are confidential. If you are not the intended recipient, any reading, printing, storage, disclosure, copying or any other action taken in respect of this email is prohibited and may be unlawful. If you are not the intended recipient, please notify the sender immediately by using the reply function and then permanently delete what you have received. Incoming and outgoing email messages are routinely monitored for compliance with the Department of Health's policy on the use of electronic communications. For more information on the Department of Health's email policy, click [DHTermsAndConditions](#)

DISCLAIMER This email and any files transmitted with it are confidential. If you are not the intended recipient, any reading, printing, storage, disclosure, copying or any other action taken in respect of this email is prohibited and may be unlawful. If you are not the intended recipient, please notify the sender immediately by using the reply function and then permanently delete what you have received. Incoming and outgoing email messages are routinely monitored for compliance with the Department of Health's policy on the use of electronic communications. For more information on the Department of Health's email policy, click [DHTermsAndConditions](#)