

Our ref: MPS/FT/002295/000
Your ref:
Email: m.scott@bhattmurphy.co.uk

Bhatt Murphy Solicitors

Investigatory Powers Tribunal
P.O.Box 33220
London
SW1H 9ZQ

Also by email

13 May 2014

Dear Sir

**Privacy International v Secretary of State for Foreign and
Commonwealth Affairs and Government Communications
New Claim**

We enclose:

1. Form T1;
2. Form T2;
3. Grounds in support.

We await hearing from you.

Yours faithfully,



Bhatt Murphy

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London N1 6NN

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The Investigatory Powers Tribunal

Human Rights Claim Form

Form T1

Please use this form if your claim is that your human rights have been infringed within the terms of the Human Rights Act 1998

You will need to complete this form if your claim is against any of the Intelligence Services or one or more of the Public Authorities listed in the accompanying T1 information leaflet or the IPT website (www.ipt-uk.com). Your claim must also include circumstances which involved (or which currently involve) the conduct described in the information leaflet.

If you wish to make a complaint, please complete form T2.

Please complete the form legibly, in black or dark ink and in block capitals. When you have completed the form please sign and date it together with any separate sheets which you wish to submit alongside the main form

You must also supply, either in or alongside the T1 form, a summary of the information, and any other documentary evidence where appropriate, on which your claim is based.

Your Details

PRIVACY INTERNATIONAL (A registered charity)

Your surname Your surname at birth (if different)

Your surname at the date(s) when the events complained of occurred (if different)

.....

Your forename(s)

Any other names by which you were commonly known when the events complained of occurred

.....

Title (Mr, Mrs, Miss etc.) Date of Birth

62 Britton Street, London EC1M 5UY

Your current address including your postcode

.....

.....

If this form is being submitted by your solicitor or adviser, please complete this section.

SCOTT

Surname of solicitor or adviser

M

Mr

Initials Title

Bhatt Murphy

Name of firm (if applicable)

27 Hoxton Square, London N1 6NN

Address including postcode

.....

.....

Please answer the following questions to the best of your knowledge and belief. If there is insufficient space on this form please use an additional sheet of paper if you need to, making it clear to which questions the additional information relates.

1. WHICH ORGANISATION OR ORGANISATIONS DO YOU BELIEVE HAS INFRINGED YOUR HUMAN RIGHTS?

(See the information leaflet or IPT website)

GCHQ and the other security and intelligence services

2. WHICH OF YOUR HUMAN RIGHTS DO YOU BELIEVE HAS BEEN INFRINGED?

(See the information leaflet or IPT website)

Articles 8 and 10 ECHR

3. AT WHICH PLACE OR PLACES WERE YOUR HUMAN RIGHTS INFRINGED?

See attached

4. WHAT HAPPENED?

(Please give details of what happened and, if it is not obvious, why you believe that what happened amounted to an infringement of your human rights. See the information leaflet or IPT website)

See attached

5. ON WHAT DATE DID THE INFRINGEMENT HAPPEN AT EACH PLACE?
(See the information leaflet)

Ongoing

6. IS THERE EVIDENCE, OTHER THAN YOUR OWN, IN SUPPORT OF YOUR CLAIM? IF SO, WHO COULD PROVIDE THAT EVIDENCE? WHAT IS THAT EVIDENCE LIKELY TO BE?

See attached

7. IF THE EVENTS WHICH YOU ARE COMPLAINING ABOUT HAPPENED MORE THAN ONE YEAR AGO, PLEASE PROVIDE A FULL EXPLANATION FOR THE DELAY IN SUBMITTING YOUR CLAIM?
(See the information leaflet)

Not applicable

8. IF THE TRIBUNAL UPHOLDS YOUR CLAIM WHAT REMEDIES DO YOU SEEK?
(See the information leaflet)

A declaration that the matters set out in the complaint are well founded and GCHQ's conduct has been unlawful, an injunction restraining any similar future conduct, an order requiring the destruction of any information unlawfully obtained and a public judgment

Do you wish correspondence from the Tribunal to be sent to you or to your solicitor or adviser instead of to you?
Please tick one box only

Please send correspondence to me

Please send correspondence to my solicitor/adviser instead of me

Confidentiality

Your claim will be handled in confidence. To carry out its functions, the Tribunal has power to call for any official documents or information it may need. The Tribunal cannot disclose details of your claim without your permission (except for the information described in Tribunal Rule 7(2)(a) and (b) quoted in the information leaflet). If it does not have your permission to disclose details of your claim it may not be possible for the Tribunal to investigate your claim properly. (See the information leaflet)



Please tick here if you are prepared to give that permission

Declaration

I have answered all the questions on the application form to the best of my knowledge and belief.

Signature



Date

May 8 2014

The Investigatory Powers Tribunal

Complaint Form

Form T2

Please complete this form if your complaint is against any of the Intelligence Services or one or more of the Public Authorities listed at the end of the T2 information leaflet, and if it is not a Human Rights claim. If you wish to make a claim under the Human Rights Act 1998, please complete Form T1.

Please complete the form legibly, in black or dark ink and in block capitals. When you have completed the form please sign and date it together with any separate sheets which you wish to submit along with the form itself.

You must also supply, either in or alongside the T2 form, a summary of the information, and other documentary evidence where appropriate, on which your complaint is based.

Your Details

PRIVACY INTERNATIONAL (A registered charity)

Your surname

Your surname at birth (if different)

Your surname at the date(s) when the events complained of occurred (if different)

.....

Your forename(s)

Any other names by which you were commonly known when the events complained of occurred

.....

Title (Mr, Mrs, Miss etc.) Date of Birth

62 Britton Street, London EC1M 5UY

Your current address including your postcode

.....

If this form is being submitted by your solicitor or adviser, please complete this section.

SCOTT

Surname of solicitor or adviser

Initials M Title Mr

Name of firm (if applicable) Bhatt Murphy

Address including postcode 27 Hoxton Square, London N1 6NN

.....

.....

Please answer the following questions to the best of your knowledge and belief. If there is insufficient space on this form please use an additional sheet of paper if you need to, making it clear to which questions the additional information relates.

1. TO WHICH ORGANISATION(S) DOES YOUR COMPLAINT RELATE AND WHY? (Please see the list in the information leaflet or refer to our website. This includes persons acting on behalf of an organisation.)

GCHQ, and the other security and intelligence services

2. WHAT IS THE NATURE OF THE CONDUCT COMPLAINED OF?

(The Tribunal can only consider your complaint if it comes under one or more of the following headings. Please tick the box or boxes which apply to your complaint.)

3. WHAT IS YOUR COMPLAINT?

(Please give details of the conduct you are complaining about, including telephone numbers and e-mail accounts, and say why you think your complaint falls within the category or categories which you have ticked.)

4. AT WHICH PLACE OR PLACES DID THE CONDUCT OF WHICH YOU COMPLAIN HAPPEN?

(Please give the full address of any property and details of any vehicles to which the complaint relates.)

Conduct which you believe to have been carried out in relation to you, by or on behalf of, any of the UK Intelligence Services. That conduct may relate to you, your property or your communications. You can complain of that conduct whether or not it involves the use of an investigatory power under the Regulation of Investigatory Powers Act 2000.

See attached

Ongoing

Your communications by post or your telecommunications have been intercepted e.g. telephone tapping or interference with your mail.

See attached

Ongoing

There has been entry onto or interference with your property or with your wireless telegraphy.

See attached

Ongoing

Surveillance by a public authority has taken place which has resulted, or is likely to result, in private information about you being obtained.

Surveillance concerning you has been carried out, or is being carried out, by a public authority in relation to anything taking place on any residential premises or in any private vehicle.

Covert human intelligence has been used in relation to you, e.g. a public authority has used, or is using, a personal or other relationship for the purpose of getting information about you.

You have been given a notice under section 49 relating to investigation of electronic data protected by encryption.

Data has been obtained relating to a communications system.

See attached

Ongoing

The carrying out of surveillance by a foreign police or customs officer (within the meaning of section 76A)

5. ON WHAT DATES(S) DID THE CONDUCT HAPPEN AT EACH PLACE? (Please see the information leaflet)

Ongoing

6. IS THERE EVIDENCE OTHER THAN YOUR OWN IN SUPPORT OF YOUR COMPLAINT? If so, who could provide that evidence? What is that evidence likely to be?

See attached

7. IF THE EVENTS WHICH YOU ARE COMPLAINING ABOUT HAPPENED MORE THAN ONE YEAR AGO PLEASE PROVIDE A FULL EXPLANATION FOR THE DELAY IN SUBMITTING YOUR COMPLAINT? (See the information leaflet)

Not applicable

8. IF THE TRIBUNAL UPHOLDS YOUR COMPLAINT WHAT REMEDIES DO YOU SEEK? (See the information leaflet)

A declaration that the matters set out in the complaint are well founded and GCHQ's conduct has been unlawful, an injunction restraining any similar future conduct, an order requiring the destruction of any information unlawfully