

EUROPEAN COURT OF HUMAN RIGHTS
COUR EUROPÉENNE DES DROITS DE L'HOMME

NG - 2014/1

Application Form

About this application form

This application form is a formal legal document and may affect your rights and obligations. Please follow the instructions given in the Notes for filling in the application form. Make sure you fill in all the fields applicable to your situation and provide all relevant documents.

Warning: If your application is incomplete, it will not be accepted (see Rule 47 of the Rules of Court). Please note in particular that Rule 47 § 2 (a) provides that: "All of the information referred to in paragraph 1 (d) to (f) [statement of facts, alleged violations and information about compliance with the admissibility criteria] that is set out in the relevant part of the application form should be sufficient to enable the Court to determine the nature and scope of the application without recourse to any other document."

Barcode label

If you have already received a sheet of barcode labels from the European Court of Human Rights, please place one barcode label in the box below.

Reference number

If you already have a reference number from the Court in relation to these complaints, please indicate it in the box below.

A. The applicant (Individual)

This section refers to applicants who are individual persons only. If the applicant is an organisation, please go to Section B.

1. Surname

2. First name(s)

3. Date of birth

D	D	M	M	Y	Y	Y	Y

 e.g. 27/09/2012

4. Nationality

5. Address

6. Telephone (including international dialling code)

7. Email (if any)

8. Sex

- male
 female

B. The applicant (Organisation)

This section should only be filled in where the applicant is a company, NGO, association or other legal entity.

9. Name

10. Identification number (if any)

11. Date of registration or incorporation (if any)

28	05	12					
D	D	M	M	Y	Y	Y	Y

 e.g. 27/09/2012

12. Activity

13. Registered address

14. Telephone (including international dialling code)

15. Email

Reset form

C. Representative(s) of the applicant

If the applicant is not represented, go to Section D.

Non-lawyer/Organisation official

Please fill in this part of the form if you are representing an applicant but *are not a lawyer*.

In the box below, explain in what capacity you are representing the applicant or state your relationship or official function where you are representing an organisation.

16. Capacity / relationship / function

17. Surname

18. First name(s)

19. Nationality

20. Address

21. Telephone (including international dialling code)

22. Fax

23. Email

Lawyer

Please fill in this part of the form if you are representing the applicant *as a lawyer*.

24. Surname

Scott

25. First name(s)

Mark

26. Nationality

British

27. Address

Bhatt Murphy Solicitors
27 Hoxton Square
London
N1 6NN

28. Telephone (including international dialling code)

44 20 7729 1115

29. Fax

44 20 7729 1117

30. Email


m.scott@bhattmurphy.co.uk

Authority

The applicant must authorise any representative to act on his or her behalf by signing the authorisation below (see the Notes for filling in the application form).

I hereby authorise the person indicated to represent me in the proceedings before the European Court of Human Rights, concerning my application lodged under Article 34 of the Convention.

31. Signature of applicant


On behalf of Privacy International

32. Date

16/03/15 | e.g. 27/09/2012
D D M M Y Y Y Y

D. State(s) against which the application is directed

33. Tick the name(s) of the State(s) against which the application is directed

- | | |
|----------------------------------------------------------|----------------------------------------------------------------------------|
| <input type="checkbox"/> ALB - Albania | <input type="checkbox"/> ITA - Italy |
| <input type="checkbox"/> AND - Andorra | <input type="checkbox"/> LIE - Liechtenstein |
| <input type="checkbox"/> ARM - Armenia | <input type="checkbox"/> LTU - Lithuania |
| <input type="checkbox"/> AUT - Austria | <input type="checkbox"/> LUX - Luxembourg |
| <input type="checkbox"/> AZE - Azerbaijan | <input type="checkbox"/> LVA - Latvia |
| <input type="checkbox"/> BEL - Belgium | <input type="checkbox"/> MCO - Monaco |
| <input type="checkbox"/> BGR - Bulgaria | <input type="checkbox"/> MDA - Republic of Moldova |
| <input type="checkbox"/> BIH - Bosnia and Herzegovina | <input type="checkbox"/> MKD - "The former Yugoslav Republic of Macedonia" |
| <input type="checkbox"/> CHE - Switzerland | <input type="checkbox"/> MLT - Malta |
| <input type="checkbox"/> CYP - Cyprus | <input type="checkbox"/> MNE - Montenegro |
| <input type="checkbox"/> CZE - Czech Republic | <input type="checkbox"/> NLD - Netherlands |
| <input type="checkbox"/> DEU - Germany | <input type="checkbox"/> NOR - Norway |
| <input type="checkbox"/> DNK - Denmark | <input type="checkbox"/> POL - Poland |
| <input type="checkbox"/> ESP - Spain | <input type="checkbox"/> PRT - Portugal |
| <input type="checkbox"/> EST - Estonia | <input type="checkbox"/> ROU - Romania |
| <input type="checkbox"/> FIN - Finland | <input type="checkbox"/> RUS - Russian Federation |
| <input type="checkbox"/> FRA - France | <input type="checkbox"/> SMR - San Marino |
| <input checked="" type="checkbox"/> GBR - United Kingdom | <input type="checkbox"/> SRB - Serbia |
| <input type="checkbox"/> GEO - Georgia | <input type="checkbox"/> SVK - Slovak Republic |
| <input type="checkbox"/> GRC - Greece | <input type="checkbox"/> SVN - Slovenia |
| <input type="checkbox"/> HRV - Croatia | <input type="checkbox"/> SWE - Sweden |
| <input type="checkbox"/> HUN - Hungary | <input type="checkbox"/> TUR - Turkey |
| <input type="checkbox"/> IRL - Ireland | <input type="checkbox"/> UKR - Ukraine |
| <input type="checkbox"/> ISL - Iceland | |

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Subject matter of the application

All the information concerning the facts, complaints and compliance with the requirements of exhaustion of domestic remedies and the six-month time-limit laid down in Article 35 § 1 of the Convention must be set out in this part of the application form (sections E., F. and G.) (Rule 47 § 2 (a)). The applicant may supplement this information by appending further details to the application form. Such additional explanations must not exceed 20 pages (Rule 47 § 2 (b)); this page limit does not include copies of accompanying documents and decisions.

E. Statement of the facts

34.

1. The Applicants are ten non-governmental human rights organisations based both within and outside the United Kingdom.

2. In May 2013, a former United States National Security Agency (NSA) systems administrator, Edward Snowden, leaked copies of classified files to a group of journalists. The disclosures revealed, for the first time, the existence and scale of secret mass communications surveillance programmes operated by the US and United Kingdom, amongst other countries, designed to capture the private communications of individuals across the globe. The leaked documents, which have been published by a variety of reputable media outlets over the past two years, have revealed, inter alia, the existence of the following bulk interception programmes:

- (1) TEMPORA – a UK Government Communications Headquarters (GCHQ) programme that involves intercepting communications passing through submarine fibre optic cables entering and exiting the United Kingdom. This enables GCHQ to access both content and communications data being transmitted through those cables.
- (2) UPSTREAM – a series of US Government programmes, similar to TEMPORA, that enable the NSA to access vast amounts of communications and communications data carried by the submarine fibre optic cables passing through, into and out of the US.
- (3) PRISM - a US Government programme which allows the NSA to access communications from many of the leading internet service providers including Apple, Facebook, Google, Microsoft, Skype, Yahoo, and YouTube. The existence of PRISM and UPSTREAM have since been acknowledged publicly by the US government.

Following the issuing of proceedings in this case at the Investigatory Powers Tribunal ('IPT') over the past two years a number of additional programmes by which the NSA and GCHQ intercept, store and analyse communications and communications data within and outside the US and UK have been revealed. These were drawn to the attention of the IPT.

3. The scale of these programmes is underlined by the fact that the majority of the world's internet traffic – particularly that between Europe and North America – is liable to travel on undersea fibre optic cables that are being tapped by GCHQ, the NSA or both. PRISM, TEMPORA, UPSTREAM and other programmes therefore enable GCHQ and the NSA to intercept the communications – and collect the communications data – of hundreds of millions of people worldwide on a daily basis. It means that any communication, even if between two individuals both located within the UK, can be intercepted by the NSA as well as GCHQ, if (as is likely to be the case) those communications leave/enter the UK on fibre optic cables to which the NSA or GCHQ have access.

4. As part of their human rights activities, each of the Applicants communicates on a regular basis with a wide range of groups and individuals, both nationally and internationally. The persons with whom they communicate include other non-governmental organisations and human rights defenders, journalists, lawyers, prisoners, victims of human rights abuses, politicians, governmental officials and whistle-blowers. The Applicants and their staff members communicate using a variety of means, including email, text messages, phone calls, video calls, social media and instant messaging. The information contained in their communications (as well as the dates, times and identities of the sender/recipient of each communication) frequently include material that is confidential and, in some cases, legally-privileged.

5. In light of these programmes, the Applicants believe that the content of their private communications and/or their communications data have been obtained by the UK government:

Statement of the facts (continued)

35.

(1) As a result of their interception and/or collection by the NSA, pursuant to PRISM and UPSTREAM, and subsequent provision by the US Government to the UK Government's security and intelligence agencies; and/or

(2) As a result of interception and collection by GCHQ directly, by way of programmes such as TEMPORA.

6. Between June and December 2013, each of the Applicants lodged complaints before the IPT. The complaints alleged that the intelligence services, the Secretary of State for the Home Department and Secretary of State for Foreign and Commonwealth Affairs had acted unlawfully under Articles 8, 10 and 14 by (a) intercepting, inspecting and retaining the Applicants' communications and their communications data; and (b) accessing or otherwise receiving their intercepted communications and communications data from the US Government and inspecting, retaining and storing that material.

7. As part of their complaints, each of the Applicants sought disclosure of all relevant material relied on by the intelligence services, in particular disclosure of all policies and guidance adopted by the services (redacted as necessary).

8. On 14 February 2014, the IPT ordered that the Applicants' claims be joined and that a public inter partes hearing be held in order to determine certain issues of law on the basis of assumed facts. It was assumed that the NSA had obtained the Applicants' communications and communications data via PRISM or UPSTREAM and had passed them on to GCHQ where they were retained, stored, analysed and shared. It was assumed that the Applicants' communications and communications data had been intercepted by GCHQ via TEMPORA and similarly retained, stored, analysed and shared. The issue before the IPT was whether, on those assumed facts, any interception, retention, storage, analysis and sharing of the Applicants' private information was in accordance with the law/prescribed by law pursuant to Articles 8 and 10, taken alone or read in conjunction with Article 14.

9. Other than PRISM, whose existence the NSA had officially confirmed, the Respondents refused to confirm or deny the existence of any of the other programmes. That was despite the fact that the existence of TEMPORA has been widely reported and commented upon in the public domain, including by former Cabinet Secretary Lord Butler, and despite the Intelligence and Security Committee confirming in a report published on 25 November 2014 that GCHQ intelligence capabilities include an "ability to access the material travelling through the fibre-optic cables carrying information to and from the UK." The Applicants argued that the government's refusal was an abuse of the intelligence services' "neither confirm nor deny" policy before the IPT. The IPT rejected that argument.

10. Between 14 and 18 July 2014, an open hearing was held in which the parties made submissions on the agreed issues. In the course of the open hearing the Respondents invited the IPT to hold a closed session in order to consider the intelligence services' secret internal guidance. The Applicants objected on the basis that there could be no proper basis for the IPT to consider closed material in order to determine whether the relevant legal framework was 'in accordance with the law' pursuant to Articles 8 and 10 ECHR. In the alternative, the Applicants invited the IPT to disclose sufficient information concerning the closed material in order to allow them to make effective submissions. In addition, some of the Applicants asked the IPT to appoint one or more special advocates to represent their interests at any closed hearing. The IPT refused each of these requests.

11. On 10 September 2014, the IPT held a closed hearing in which it considered inter alia the internal arrangements of the intelligence services as outlined above. The Applicants were not represented at the hearing. Nor were they provided with a summary of the closed material.

Statement of the facts (continued)

36.

12. On 9 October 2014, the Applicants were notified by the IPT that it had "concluded that there was closed material relied upon by the [Respondents] which could be disclosed to the parties, and invited the [Respondents] to consent to such disclosure". The Applicants subsequently received an untitled note from the IPT that appeared to summarise some of the Respondents' internal guidance for the receipt of intercepted material from foreign governments.

13. On 14 October 2014, the Applicants asked the IPT to provide some indication as to the "nature, provenance and history" of the note as well as "the reliance placed upon it" by the Respondents in the closed proceedings. By an email dated 15 October 2014, the IPT refused this request. The status of the note was unclear. It is not clear whether it is an actual policy, or part of a policy, used by the intelligence services, a summary of a policy, or a summary of submissions made by the services at a closed hearing. It is also not clear whether the note sets out an approach that the intelligence services regard as binding or is simply a description of desirable practices. It is not clear who promulgated the note or has the power to amend it.

14. On 23 October and 5 November 2014, the Respondents produced fresh versions of the note, each time containing further corrections.

15. On 6 November 2014, the NGO Reprieve published details of the disclosure that it had received from the intelligence services on 29 October 2014 in the matter of Belhaj and others v Security Service and others (IPT/13/132-9/H) ("the Belhaj material"). This material included internal guidance from the Respondents on how to deal with intercepted material subject to legal professional privilege ('LPP').

16. At an open hearing held on 7 November 2014, the Applicants renewed their application for further disclosure of all relevant material relating to the Respondents' internal arrangements under ss15 and 16 RIPA. Among other things, the Applicants noted that Exhibit 14 of the Belhaj material appeared to be the original document upon which the intelligence services' note had been based. The IPT refused the Applicants' application but directed the Respondents to clarify the relationship between Exhibit 14 of the Belhaj material and the note provided to the Applicants.

17. On 12 November 2014, the intelligence services provided the Applicants with a note on Exhibit 14, together with a further version of the note containing additional text "intended to address certain of the [Applicants'] concerns in relation to the [note]".

18. On 17 November 2014, the Applicants renewed their application for disclosure of all relevant material relating to the internal guidance of the intelligence services, particularly in relation to the handling of confidential material that had been obtained by the interception of private communications either under s8 (4) of RIPA or from a foreign intelligence service. This was refused.

19. On 5 December 2014 the IPT gave judgment on several of the legal issues. Its ruling is annexed as document 73. It found, for reasons summarised in the attached additional submissions, that the regime for interception, examination and retention of communications and communications data was lawful. It also found that, following the publication of the note referred to above, the soliciting, receiving, storing and transmitting of communications of individuals located in the UK which had been obtained by the NSA was lawful by the time of the IPT's judgment. On 6 February 2015 the IPT handed down its second judgment. The ruling is annexed as document 74. The IPT held that at the time proceedings were issued, and prior to the publication of the note referred to above, the regime for soliciting and receiving information from the NSA was not lawful.

20. Further details of the facts relied upon are set out in the attached additional submissions.

F. Statement of alleged violation(s) of the Convention and/or Protocols and relevant arguments

37. Article invoked	Explanation
<p>Article 6</p>	<p>The proceedings before the IPT breached the right to a fair hearing as follows: (1) The IPT declined to direct the intelligence services to disclose any of their internal guidance concerning the treatment of confidential material of non-governmental organisations under Article 10; (2) The IPT took the position that it had no power in any event to require the intelligence services to disclose such evidence; (3) The IPT wrongly held a closed hearing on whether the relevant framework governing the intelligence services' bulk interception and receipt of material of foreign intelligence agencies was in accordance with law; (4) The IPT refused to hear and decide one of the preliminary issues that was agreed between the parties (and with the express approval of the IPT), namely whether the application of the Respondents' policy of 'neither confirming nor denying' the existence of particular interception programmes was justified on the facts of the present cases; (5) In finding that the existing interception regime was in accordance with the law, the IPT placed significant reliance on secret arrangements which were not disclosed to the Applicants and on which the Respondents were permitted to make submissions during closed proceedings; (6) The IPT took no steps to ensure that the Applicants were effectively represented in the closed proceedings.</p>
<p>Article 8</p>	<p>The s8(4) regime under the domestic legislation (RIPA) for bulk interception, inspection, retention and disclosure of communications and communications data is not "in accordance with the law" as required by Article 8(2).</p> <p>The interception regime under s8(4) cannot be characterised as either "necessary in a democratic society" or proportionate under Article 8(2).</p> <p>The receipt, inspection and retention of intercepted communications and communications data obtained under PRISM and UPSTREAM is not carried out "in accordance with the law".</p>
<p>Article 10</p>	<p>The legal framework governing the interception of communications and communications data under s8(4) warrants, and the receipt of intercepted communications and communications data from foreign intelligence agencies, fails to meet the "prescribed by law" requirement of Article 10 ECHR.</p> <p>The interception regime under s8(4) cannot be characterised as either "necessary in a democratic society" or proportionate under Article 10(2).</p>
<p>Article 14</p>	<p>In association with interferences with Articles 8 and 10, the different treatment and applicable safeguards for persons within the UK when compared to people outside the UK was discriminatory and not justified.</p> <p>Further details are set out in the attached additional submissions.</p>

G. For each complaint, please confirm that you have used the available effective remedies in the country concerned, including appeals, and also indicate the date when the final decision at domestic level was delivered and received, to show that you have complied with the six-month time-limit.

<p>38. Complaint Articles 6, 8, 10 and 14</p>	<p>Information about remedies used and the date of the final decision</p> <p>Between June and December 2013, each of the Applicants lodged complaints before the IPT. The complaints alleged that the intelligence services, the Secretary of State for the Home Department and Secretary of State for Foreign and Commonwealth Affairs had acted unlawfully under Articles 8, 10 and 14 by (a) intercepting, inspecting and retaining the Applicants' communications and their communications data; and (b) accessing or otherwise receiving their intercepted communications and communications data from the US government and inspecting, retaining and storing that material.</p> <p>On 14 February 2014, the IPT ordered that the Applicants' claims be joined and that a public inter partes hearing be held in order to determine certain issues of law on the basis of assumed hypothetical factual premises agreed between the parties.</p> <p>Before the IPT, the Applicants made each of the Article 6 arguments now advanced to the Court. Each was rejected.</p> <p>On 5 December 2014, the IPT handed down judgment dismissing the complaints made under Articles 8, 10 and 14, subject to the matters set out below.</p> <p>On 6 February 2014, the IPT delivered its second judgment, in which it declared that prior to the disclosures made and referred to in its first and second judgments the regime governing the soliciting, receiving, storing and transmitting by UK authorities of private communications of individuals located in the UK, which have been obtained by US authorities pursuant to PRISM and/or UPSTREAM, previously contravened Articles 8 or 10 ECHR.</p> <p>There is no right of appeal against a decision of the IPT. Section 68(8) of RIPA provides that "Except to such extent as the Secretary of State may by order otherwise provide, determinations, awards, orders and other decisions of the Tribunal (including decisions as to whether they have jurisdiction) shall not be subject to appeal or be liable to be questioned in any court". No relevant order providing for a right to appeal has been made.</p>
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39. Is or was there an appeal or remedy available to you which you have not used? Yes
 No

40. If you answered Yes above, please state which appeal or remedy you have not used and explain why not.

[Empty text box for providing details on appeals or remedies not used.]

H. Information concerning other international proceedings (if any)

41. Have you raised any of these complaints in another procedure of international investigation or settlement? Yes
 No

42. If you answered Yes above, please give a concise summary of the procedure (complaints submitted, name of the international body and date and nature of any decisions given).

[Empty text box for providing a summary of international proceedings.]

43. Do you (the applicant) currently have, or have you previously had, any other applications before the Court? Yes
 No

44. If you answered Yes above, please write the relevant application number(s) in the box below.

58243/00 - Liberty and the Irish Council for Civil Liberties
37374/05 - Hungarian Civil Liberties Union (Társaság a Szabadságjogokért)
60646/14 - Privacy International

I. List of accompanying documents

You should enclose full and legible *copies* of all documents.

No documents will be returned to you. It is thus in your interests to submit copies, not originals.

You MUST:

- arrange the documents in order by date and by procedure;
- number the pages consecutively;
- NOT staple, bind or tape the documents.

45. In the box below, please list the documents in chronological order with a concise description.

1. Privacy International's statement of grounds 08.07.13
2. Liberty's grounds of claim 19.07.13
3. ACLU and others' grounds of claim 13.11.13
4. The Respondents' open response to the Liberty and Privacy International claims 13.11.13
5. Amnesty International's notice of grounds and complaint 06.12.13
6. Liberty's note on legal issues and other matters relating to directions 20.12.13
7. Privacy International's reply 20.12.13
8. Bytes for All's statement of grounds 20.12.13
9. The Respondent's open response to the ACLU and other claims 07.02.14
10. The Respondent's open response to Amnesty claim 07.02.14
11. The Respondent's open response to the Bytes for All claim 07.02.14
12. Order following directions hearing on 14.02.14
13. Order following second judgment 06.02.15
14. Witness statement of Dr Ian Brown (for Privacy International) 27.09.13
15. Witness statement of Cindy Cohn (for Privacy International) 27.09.13
16. Witness statement of Cindy Cohn (for Privacy International) 05.06.14
17. Witness statement of Dr Ian Brown (for Privacy International) 07.06.14
18. Witness statement of Dr Ian Hossein (for Privacy International) 08.06.14
19. Witness statement of Eric King (for Privacy International) 08.06.14
20. Witness statement Michael Bochenek (for Amnesty International) 09.06.14
21. Witness statement of Eric King (for Privacy International) 11.07.14
22. Witness statement of Eric King (for Privacy International) 19.01.15
23. Witness statement of Charles Farr (for the Respondents) 16.05.14
24. Privacy International and Bytes for All skeleton argument for preliminary hearing 12.06.14
25. Liberty and ACLU and Others skeleton argument for preliminary hearing 12.06.14

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Continuation of list of accompanying documents

26	Amnesty International's skeleton argument for preliminary hearing	13.06.14
27	Respondents' skeleton argument for preliminary hearing	03.07.14
28	Note from Counsel to the Tribunal	12.07.14
29	Liberty and Others – Note on the appointment of a special advocate	24.07.14
30	Respondents' further submissions	25.07.14
31	Privacy International and Bytes for All – Note on special advocate and closed hearing	28.07.14
32	Amnesty International – Note on potential closed hearing	28.07.14
33	Privacy International and Bytes for All – Reply to Respondent's further submissions	29.07.14
34	Liberty and ACLU and Others – Further submissions on communications data	29.07.14
35	Privacy International and Bytes for All – Letter Bhatt Murphy (BM) to Investigatory Powers Tribunal (IPT)	06.08.14
36	Liberty and ACLU and Others – Letter Liberty to IPT	08.08.14
37	Amnesty International – Letter Amnesty to IPT	11.08.14
38	Email IPT to Claimants	20.08.14
39	Privacy International and Bytes for All – Letter BM to IPT	28.08.14
40	Liberty and ACLU and Others – Letter Liberty to IPT	02.09.14
41	Amnesty International – Letter Amnesty to IPT	03.09.14
42	Note No.2 From Counsel to the Tribunal	10.09.14
43	Email IPT to all parties and attached disclosure	09.10.14
44	Privacy International and Bytes for All – Letter BM to IPT	14.10.14
45	Liberty and ACLU and Others – Letter Liberty to IPT	14.10.14
46	Amnesty – Letter Amnesty to IPT	15.10.14
47	Email IPT to Claimants	15.10.14
48	Amnesty – Note on disclosed material	22.10.14
49	Privacy International and Bytes for All – Supplemental submissions	22.10.14
50	Liberty and ACLU and Others – Response to disclosure on 9 October 2014	22.10.14
51	IPT – Email IPT to all parties	23.10.14
52	Treasury Solicitors – Email Treasury Solicitors to all parties with amended disclosure	23.10.14
53	Liberty and ACLU and Others – Second response to disclosure on 9 October 2014	24.10.14
54	Privacy International and Bytes for All – Further supplemental submissions	24.10.14
55	Treasury Solicitors – Email Treasury Solicitors to all parties	28.10.14
56	Treasury Solicitors – Letter and attached statement	05.11.14
57	Privacy International and Bytes for All notes for hearing	07.11.14
58	Amended statement	12.11.14
59	Respondents' note on exhibit 14 as disclosed in the Belhadj proceedings	12.11.14
60	Privacy International and Bytes for All – Submissions following further amendment to Respondent's note	17.11.14

61	Liberty and ACLU and Others – Further submissions on disclosure	17.11.14
62	Respondents' submissions in response to the Claimants' submissions of 17 November 2014	19.11.14
63	Liberty and ACLU and Others – Further submissions on disclosure	12.12.14
64	Privacy International and Bytes for All – Submissions on remedy	12.12.14
65	Liberty and ACLU and Others – Submissions on paragraph 4(i) and (ii) of the Tribunal's order of 5 December 2014	12.12.14
66	Amnesty – Submissions on paragraph 4 of the Tribunal's order of 5 December 2014	12.12.14
67	Respondents' submissions pursuant to the Tribunal's order of 5 December 2014	19.12.14
68	Liberty and ACLU and Others – Submissions on proportionality and lawfulness	19.01.15
69	Privacy International and Bytes for All – Submissions on proportionality	19.01.15
70	Privacy International and Bytes for All – Submissions on remedy	19.01.15
71	Amnesty – Submissions on paragraph 6 of the Tribunal's order of 5 December 2014	19.01.15
72	Respondents' reply submissions pursuant to the Tribunal's direction of 22 January 2015	28.01.15
73	IPT's first judgment	05.12.14
74	IPT's second judgment	06.02.15
75	Intelligence and Security Committee of Parliament – Privacy and Security: A modern and transparent legal framework	15.03.15
76	Report of the Interception of Communications Commissioner	March 2015

Any other comments

Do you have any other comments about your application?

46. Comments

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Declaration and signature

I hereby declare that, to the best of my knowledge and belief, the information I have given in the present application form is correct.

47. Date

3	1	0	3	2	0	1	5
D	D	M	M	Y	Y	Y	Y

e.g. 27/09/2012

The applicant(s) or the applicant's representative(s) must sign in the box below.

48. Signature(s) Applicant(s) Representative(s) - tick as appropriate

James Welch (JAMES WELCH)
N.R. Williams (N.R. WILLIAMS)
Mark Scott (MARK SCOTT)
 BHATT MURPHY

Confirmation of correspondent

If there is more than one applicant or more than one representative, please give the name and address of the one person with whom the Court will correspond.

49. Name and address of Applicant Representative - tick as appropriate

James Welch
 Liberty
 26-30 Strutton Ground
 London SW1P 2HR
 United Kingdom

The completed application form should be signed and sent by post to:

The Registrar
 European Court of Human Rights
 Council of Europe
 67075 STRASBOURG CEDEX
 FRANCE