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Freedom of Information

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Four new tools help authorities to apply exemptions

The Information Commissioner's Office has introduced a series of concise, targeted resources aimed at assisting Freedom of Information practitioners in effectively applying exemptions under the Freedom of Information Act 2000 ('FOIA').

The new tools are designed to address recurring challenges identified through analysis of FOI complaints, providing practical support to public authorities across the UK.

The first tool is a Cost Estimate Worksheet (Section 12 FOIA). Section 12 of FOIA allows public authorities to refuse a request if the estimated cost of complying exceeds a specified limit. The ICO's new worksheet assists practitioners in accurately estimating these costs, ensuring consistency and transparency. The tool also serves as a record of the estimation process, which can be valuable in case of future complaints or reviews.

The second tool is a Future Publication Exemption Tool (Section 22 FOIA). Section 22 permits withholding information intended for future publication. The tool guides practitioners through the criteria for applying this exemption, helping to determine its appropriateness. Feedback from the ICO's Upstream Feedback Group indicates that the tool clarifies common ambiguities, enhancing decision-making accuracy.

The third tool is Investigations and Law Enforcement Tables (Sections 30 and 31 FOIA). Sections 30 and 31 encompass multiple exemptions related to investigations and law enforcement.

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Cabinet Office ordered to disclose information on Boris Johnson meetings

The First-tier Tribunal has concluded that the Cabinet Office must release additional documents related to former Prime Minister Boris Johnson's meetings with Indian industrialist Gautam Adani.

The case, *The Cabinet Office v The Information Commissioner* [2025] UKFTT 202 (GRC), was brought forward by campaigner Dr Chris Garrard, who challenged the Cabinet Office's refusal to disclose information under FOIA, citing exemptions concerning international relations and the qualified person's opinion.

The Tribunal determined that the Cabinet Office had not conducted a comprehensive search for all relevant information, particularly internal emails pertinent to Dr Garrard's request.

It also ruled that recent revelations about Adani's alleged involvement in a large-scale bribery scheme were admissible, as they provided context to the events at the time of the original request.

Further, the Tribunal found that the Cabinet Office's reliance on the exemptions was insufficiently justified, leading to the order for the release of the withheld infor-

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