

# GREATER LONDON AUTHORITY

**Zara Pradyr**  
(By email)

Our Ref: MGLA040619-3965

17 June 2019

Dear Ms Pradyr

Thank you for your request for information which the GLA received on 3 June 2019. Your request has been dealt with under the Freedom of Information Act 2000.

You asked for;

*1. Please can you send me copies of written internal communication between GLA officers, and of written communication between GLA officers and any person, company or other entity outside of the GLA - including, where permitted, the name of the company or entity and the position of the person within that company or other entity with whom communication took place - relating to the Kingston Direction of Travel Adoption Report, all between the dates of 1 May 2016 and 31 March 2017 inclusive, all in whatsoever form such communication may exist.*

*2. Please can you send me agendas and minutes of any meetings, and any reports supporting or stemming from such meetings, in which the Kingston Direction of Travel Adoption Report is mentioned, all between the dates 1 May 2016 and 31 December 2018?*

*3. Please can you send me evidence of the date on which the Mayor added his signature to the Direction of Travel Adoption Report for the Royal Borough of Kingston upon Thames, including a screenshot of the GLA web editing tool that shows the creation and edit history for the Direction of Travel Adoption Report? I am aware that there was only an unsigned version of the Adoption Report available from the GLA until March 2019. Please send me the original signed Direction of Travel Adoption Report that bears the Mayor's handwritten signature and not a scanned copy of his signature*

Between the 9 and 31 May 2019, the GLA received 13 similar requests for information, one of which is identical to your request. These requests were refused on grounds that the GLA considered the requests to be 'manifestly unreasonable' under Regulation 12(4)(b) of the Environmental Information Regulation (EIR).

Between 3 and 5 June, the GLA received 4 further requests from newly created whatdotheyknow.com accounts that ask for the exact same information using the wording and format of the original requests. This includes your request.

These requests therefore fall under the exception to disclose because it is considered to be

‘manifestly unreasonable’ under regulation 12(4)(b) of the Environmental Information Regulation (EIR), in line with our previous decision relating to the 13 requests concerning the Kingston Direction of Travel Adoption Report. However, this provision also allows public authorities to refuse requests which are vexatious.

The ICO has published [guidance](#) for public authorities in recognising vexatious requests and in particular those from a number of individuals acting as part of a campaign;

*91. If a public authority has reason to believe that several different requesters are acting in concert as part of a campaign to disrupt the organisation by virtue of the sheer weight of FOIA requests being submitted, then it may take this into account when determining whether any of those requests are vexatious.*

For the reasons we have described above, we have reasonable grounds to believe this request has been made in attempt to circumvent a previous GLA response to aggregate the cost of complying with campaign of requests on this same subject matter.

Furthermore, we also have reasonable grounds to suspect that a number of requests are being submitted as part of a wider campaign. In accordance with the *Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulation 2004*, the GLA is entitled to aggregate the cost of complying with a request where it receives requests from different persons who appear to the public authority to be acting in concert or in pursuance of a campaign, and who are asking for the same or substantially similar information.

Please note that in engaging the exception under regulation 12(4)(b), the GLA is only concerned with the nature of the requests received and the impact of dealing with them and not any adverse effect that might arise from disclosure of the content of any information potentially in scope.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

**Paul Robinson**  
**Information Governance Officer**

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA’s FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>