

19 May 2025

Case reference: IC-380280-W3J8

We are now in a position to respond to your information request of 22 April.

Request

"Please could you provide me with all internal and external communications, including any internal correspondence or meeting notes related to the Supreme Court decision clarifying the legal definition of 'woman' in the Equalities Act 2010?"

We have handled your request for recorded information under the Freedom of Information Act 2000 (FOIA).

Our response

We have considered the cost of complying with your request and can confirm that it exceeds the 'appropriate limit' as set out in section 12 of the FOIA.

Section 12 of the FOIA makes clear that a public authority is not obliged to comply with an FOIA request if the authority estimates that the cost of complying with the request would exceed the appropriate limit. The appropriate limit for the ICO, as determined in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 is £450. We have determined that £450 would equate to 18 hours work.

You have requested all internal and external communications, including any internal correspondence or meeting notes, related to the Supreme Court [judgement](#) published on 16 April 2025.

The information within scope of your request could potentially be held by any ICO team or member of staff within the organisation. In order to locate the information, we would need to consult with a large number of staff. As at March 2025, we had 1,074 permanent staff. This would involve each member of staff searching their individual email accounts. Records held at team level would also need to be searched. Clearly, the time it would take to conduct these searches would be well in excess of the section 12 FOIA appropriate limit (18 hours).

You could consider narrowing the scope of your request to bring it within the appropriate limit. Such as, a search for specific ICO teams, departments or

certain management levels. Please note, FOIA exemptions may apply to information within scope of a refined request. For example, information that constitutes the personal data of ICO staff. Our [Employee information disclosure policy](#) is available on our website.

This concludes our response to your request. We understand this response may be disappointing but hope the information provided above is helpful.

Next steps

You can ask us to review our response. Please let us know in writing if you want us to carry out a review. Please do so within 40 working days. You can read a copy of our full [review procedure](#) on our website.

If we perform a review but you are still dissatisfied, you can complain to the ICO as regulator of the FOIA. This complaint will be handled just like a complaint made to the ICO about any other public authority. You can [raise a complaint](#) through our website.

Your information

Our [privacy notice](#) explains what we do with the personal data you provide to us, and sets out [your rights](#). Our [Retention and disposal policy](#) details how long we keep information.

Yours sincerely



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