**IMPORTANT:** the address for service changed in February 2024, as below.

Please send your letter by post to DWP and by email to the Treasury Solicitor.

Please seek advice from JRProject@CPAG.org.uk if no response is received within 14 days, or consider referring to a solicitor to issue judicial review proceedings, see [this CPAG page](https://cpag.org.uk/welfare-rights/support-advisers/support-advisers-england-and-wales/support-judicial-review-process/pursuing-court-and) for more information.

Delete Box Before Posting

[address your letter to either the:

address on your client’s decision letter,

address your client sent their claim to, or

address on relevant DWP correspondence; or

request an upload link to post it to your client’s online UC account]

**And by email to:** thetreasurysolicitor@governmentlegal.gov.uk

**Our Ref:**

**Date:**

**Judicial Review Pre-Action Protocol Letter Before Claim**

**Dear Sir or Madam,**

**Re: Proposed claim for judicial review against the Secretary of State for Work and Pensions by [full name]**

##### We are instructed by [NAME] **in relation to [her/his] Universal Credit (‘**UC**’). We write in accordance with the Pre-action Protocol for Judicial Review. Please note that we are requesting your response as soon as possible and in any event no later than by 4pm on the date at the end of this letter.**

**Proposed Defendant: Secretary of State for Work and Pensions (“D”)(“SSWP”)**

**Claimant:** [full name] (“**C**”)

**NINo:** [xxxx]

**Address:** [xxxx]

**Date of Birth:** [xxxx]

**Note on the address for Pre-action Protocol correspondence**

1. This letter is sent to you because in February 2024 a Senior Lawyer at Decision Making and Debt DWP Legal Advisers, Government Legal Department, Ground Floor Caxton House, Tothill Street, London, SW1H 9NA advised that:

*Pre-action correspondence should now be sent directly to DWP, not to DWP Legal Advisers. DWP Legal Advisers is part of the Government Legal Department, not DWP itself. Pre-action correspondence should be sent to the relevant section of DWP. This will normally be the section of DWP responsible for the decision which is the subject of the pre-action correspondence via their usual communication methods. For example if it relates to a particular benefit decision then the pre-action letter should be sent to the address at the top of that letter.*

1. **This letter is also sent by email to the Treasury Solicitor as** Cabinet Office practice direction ‘Crown Proceedings Act 1947’ (December 2023)[[1]](#footnote-1) requires:

*“****All documents*** *required to be served on the Crown for the purpose of or in connection with any civil proceedings by or against the Crown shall, if those proceedings are by or**against an authorised Government department,* ***be served on the solicitor****, if any, for that department”*

(Emphasis added)

1. The practice direction provides that the solicitor for service in connection with civil proceedings against the Department for Work and Pensions is “The Treasury Solicitor”.
2. **The Government Legal Department webpage**[[2]](#footnote-2) **further instructs:**

***[…]***

*The email addresses above are for the service of new proceedings only.
They should not be used for letters before action, or pre action protocol correspondence. If sending such documents to GLD please email these to**thetreasurysolicitor@governmentlegal.gov.uk**.*

**The details of the matter being challenged**

1. **The proposed Claimant (‘C’) is challenging SSWP’s:**
2. **failure to exercise her discretion to administer C’s UC account ‘offline’, in other words, communicating with C using paper and telephone rather than requiring C to use an online account, when the processes exist to do so and it would be reasonable in the circumstances; and**
3. **failure to make reasonable adjustments to prevent disadvantage resulting from C’s [health condition/disability]**

***Background facts***

1. **C has [describe health condition/disability.]**
2. **[Describe how C’s health condition/disability currently affect her/his ability to use an online UC account]**
3. **C claimed UC on [date]. [explain how and why s/he claimed online – pushed to do so? Helped by someone who is no longer available to help her/him with accessing the account? Or able to manage online at the time s/he claimed, but has since become less able due to onset/deterioration/fluctuation of condition?**
4. **[Describe attempts to get the account switched from an online one to a telephone and paper one. Asked in Jobcentre? On phone? Messages in journal? Complaint? What evidence if any provided to support the request? What response from DWP? Copy and paste messages/letters where possible]**
5. **[What are the consequences of C being stuck with an online account? C unable to check award/budget as can’t see statements? C missing messages, appointments? Getting sanctioned/threatened with sanctions? Any impact on eg. mental wellbeing, health, income, family life? Include as much detail as possible]**

**Note on D’s duty of candour**

1. As D will be aware, the duty of candour arises as soon as a public authority becomes aware that someone is likely to test or challenge a decision or action. The duty is engaged at every stage of the proceedings, including the pre-action stage, as confirmed in *R (HM, KH and MA) v Secretary of State for the Home Department* 3 [2022] EWHC 2729 (Admin).
2. If any guidance, policy or guidelines exists concerning any of the matters raised in the Background section above, we consider that compliance with the pre-action protocol and the duty of candour requires that it be i) disclosed and ii) provided in full for inspection, as part of the response to this letter.

***Legal background***

***Legislation***

1. **Under regulation 8 Universal Credit, Personal Independence Payment, Jobseeker's Allowance and Employment and Support Allowance (Claims and Payments) Regulations 2013 (‘UC (CP) Regs’) a non-digital claim for UC can be made in certain specified classes of cases, plus in other cases subject to SSWP’s discretion:**

##### *Making a claim for universal credit*

##### *8.-(1) Except as provided in paragraph (2), a claim for universal credit must be made by means of an electronic communication in accordance with the provisions set out in Schedule 2 and completed in accordance with any instructions given by the Secretary of State for that purpose.*

##### *(2) A claim for universal credit may be made by telephone call to the telephone number specified by the Secretary of State if the claim falls within a class of case for which the Secretary of State accepts telephone claims or where, in any other case, the Secretary of State is willing to do so.*

##### (Emphasis added)

##### Under paragraph 1 of Schedule 2 UC (CP) Regs, SSWP has a discretion over the use of electronic communication methods in administering ongoing awards:

##### *(1) The Secretary of State may use an electronic communication in connection with claims for, and awards of, any benefit.*

##### (Emphasis added)

##### This discretion therefore applies not only in relation to claims and payments, (pursuant to reg 3 UC (CP) Regs), but also in relation to the administration of the award itself (for example the procedures for obtaining information from a claimant about their circumstances, giving notices to a claimant about decisions etc).

##### This is further confirmed by reg 4 Universal Credit, Personal Independence Payment, Jobseeker’s Allowance and Employment and Support Allowance (Decisions and Appeals) Regulations 2013 (‘UC (DA) Regs’):

### *Electronic communications*

### *4.  Schedule 2 (electronic communications) to the Claims and Payments Regulations 2013 applies to the delivery of electronic communications to or by the Secretary of State for the purposes of these Regulations in the same manner as it applies to the delivery of electronic communications for the purposes of the Claims and Payments Regulations 2013.*

##### (Emphasis added)

##### There is nothing elsewhere in the social security legislation that prescribes electronic methods for communication with or by a UC claimant.

##### Regulation 51 UC (DA) Regs requires SSWP to provide written decision notices:

##### *51.-(2) The Secretary of State must—*

 *(a)* ***give P written notice*** *of the decision and of the right to appeal against that decision;*

##### (Emphasis added)

##### It does not specify that this written communication must be online. It is silent as to whether these notices should be provided online or by post. Such notices include universal credit payment statements.

##### Regulation 38 UC (CP) Regs covers the provision of information and evidence by the claimant in connection with an award of UC, including:

##### *Evidence and information in connection with an award*

##### *38.-(3) A person to whom this regulation applies must supply in such manner and at such times as the Secretary of State may determine such information or evidence as the Secretary of State may require in connection with payment of the benefit awarded.*

##### (Emphasis added)

##### It does not specify that these communications must be online. SSWP has the discretion under reg 38 UC (CP) Regs to require or exclude the supply of information or evidence by *any* method including for example by telephone, in writing, in person, or online. This discretion must be exercised in accordance with public law principles including compliance with the Equality Act 2010 (‘EA 2010’) and regard to relevant factors such as C’s health and personal circumstances and DWP’s own guidance.

##### As standard (unless otherwise determined by SSWP) notification of a change of circumstances by claimants in writing or by telephone will be accepted by SSWP:

##### *38.- (5) A notification of any change of circumstances under paragraph (4) must be given—*

##### *(a) in writing or by telephone (unless the Secretary of State determines in any case that notice must be given in a particular way or to accept notice given otherwise than in writing or by telephone); or*

##### *(b) in writing if in any class of case the Secretary of State requires written notice (unless the Secretary of State determines in any case to accept notice given otherwise than in writing),*

##### *and must be sent or delivered to, or received at, the appropriate office.*

##### Under section 14(3) Welfare Rights Act 2012 (“WRA 2012”):

##### *Claimant commitment*

#####  *14.-(…)(3) A claimant commitment is to be in such form as the Secretary of State thinks fit.*

##### Under section 24(4) WRA 2012, which concerns work-related requirements:

##### *Imposition of requirements*

##### *24.-(…)(4) Notification of a requirement imposed under this Part (or any change to or revocation of such a requirement) is, if not included in the claimant commitment, to be in such manner as the Secretary of State may determine.*

##### Regulation 38 (CP) Regs and ss.14(3) and 24(4) WRA provide SSWP with discretion as to how to communicate with claimants. This discretion must also be exercised under public law principles, as described above.

##### Under section 19 EA 2010 it is indirectly discriminatory to claimants with protected characteristics, which include disability, to apply a criterion or practice to all claimants (here, requiring them to manage their UC accounts and communicate with SSWP by online methods), which places claimants with that protected characteristic at a disadvantage where that criterion or practice cannot be shown to be a proportionate means of achieving a legitimate aim.

#####  *Indirect discrimination*

##### *19.-(1) A person (A) discriminates against another (B) if A applies to B a provision, criterion or practice which is discriminatory in relation to a relevant protected characteristic of B's.*

##### *(2) For the purposes of subsection (1), a provision, criterion or practice is discriminatory in relation to a relevant protected characteristic of B's if—*

##### *(a) A applies, or would apply, it to persons with whom B does not share the characteristic,*

##### *(b) it puts, or would put, persons with whom B shares the characteristic at a particular disadvantage when compared with persons with whom B does not share it,*

##### *(c) it puts, or would put, B at that disadvantage, and*

##### *(d) A cannot show it to be a proportionate means of achieving a legitimate aim.*

##### *(3)The relevant protected characteristics are—*

##### *(…) disability;*

##### Under section 20 EA 2010 SSWP has a duty to make reasonable adjustments in the way contact is made with, and required from, the claimant, to avoid disadvantage to claimants with disabilities, such as C:

##### *Duty to make adjustments*

***20****.-(2) The duty comprises the following three requirements.*

*(3) The first requirement is a requirement, where a provision, criterion or practice of A's puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.*

1. Under section 21 EA 2010, failure to comply with the s.20 duty to make adjustments constitutes discrimination:

##### *Failure to comply with duty*

***21****.-(1) A failure to comply with the first, second or third requirement is a failure to comply with a duty to make reasonable adjustments.*

*(2) A discriminates against a disabled person if A fails to comply with that duty in relation to that person.*

***Defendant’s Guidance***

**Spotlight On: Claims By Phone (undated)[[3]](#footnote-3) and Making and Maintaining a Phone Claim (August 2019)[[4]](#footnote-4)**

1. **These DWP internal pieces of guidance include identical provisions on making telephone claims:**

*The facility for claimants to make new claims by phone is available for those who are unable to complete the online service due to the following circumstances:*

* + *being unable to make a claim online independently, perhaps due to a health condition or not having the digital skills*
	+ *not having anyone to support them to make a claim online*
	+ *being unable to claim online with in-house jobcentre support (see Assisted Digital Overview)*
	+ *being unable to claim online even with support from Citizens Advice or Citizens Advice Scotland using the Help to Claim Service-in these cases, Citizens Advice or Citizens Advice Scotland will have identified that the claimant cannot use online services and a claim by phone is appropriate(for more information, see Spotlight on: Help to Claim)*
	+ *not having access to a digital device or internet access to be able to make and maintain a claim online*

*(…) If a claimant does not satisfy the above circumstances but insists on making a claim by phone, they must be allowed to do so.*

1. Both pieces of guidance also contain identical provisions on switching an online account to a telephone and paper-based account:

***Claimants who are no longer able to maintain their claim online***

*There may be reasons why claimants with a digital claim are no longer able to manage their claim online. This could be short term, such as a brief admittance to hospital; or longer term, such as a new health condition.*

*Where a claimant has an online claim but now needs support similar to a claimant with a phone claim, the following actions should be taken:*

*• a profile note explaining the claimant’s circumstances should be added to the claimant history and ‘pinned’ to the claimant’s dashboard so agents are aware of their needs and any additional support required*

*• communication with the claimant will need to be through alternative methods, such as phone or post, rather than the journal*

*• any requirements placed on the claimant should consider their new circumstances*

**Reasonable Adjustments (version 4 – 2020, current)[[5]](#footnote-5)**

1. **This internal DWP guidance states in general terms:**

*If a disabled claimant is at a disadvantage in comparison with a non-disabled claimant, we must remove or alter what we do to avoid the disadvantage. We call this a reasonable adjustment.*

*If the claimant requires an adjustment to the way we send them information (for example, a notification) we must provide it in an alternative format that suits the claimant.*

*(…) Disabled claimants may require additional support from us in order to make and maintain their claim. This may be because they:*

* *are blind, partially sighted, colour blind*
* *are deaf, hard of hearing, hearing impaired.*
* *have difficulty walking, difficulty or inability to use their hands*
* *have difficulties with memory retention, memory attention, logic skills, problem solving*
* *have learning disabilities or learning difficulties such as dyslexia or autism*

*This list is not exhaustive.*

1. ‘Reasonable Adjustments’goes on to provide specifically:

 *Claimants who cannot make* ***or maintain******their claim online can use the ‘Claims by phone’ process.*** *A message added to the top of their journal, identifies claimants as being nondigital which prompts work coaches and case managers to use alternative ways to communicate with the claimant. These claimants will also receive their monthly award statement by post.*

(Emphasis added)

1. The process being described in this section is the process used for the conversion of an online account into a telephone- and paper-based account, as set out in the other guidance. This section of the Reasonable Adjustments guidance therefore does not only apply to (new) ‘claims’ but also to ongoing awards.

**Non-Digital Relationships (version 3 – 2020, current)[[6]](#footnote-6)**

1. **The Defendant’s guidance ‘Non-Digital Relationships’ describes in some detail the support to be given to non-digital UC claimants and in using the expression ‘*make and maintain’* throughout, it is clear that this guidance is intended to apply both to those unable to claim online and those (later) unable to maintain an award via an online account (DWP guidance unhelpfully uses the term “claim” to refer both to the process of making a claim and also to awards of a benefit which may result from such a claim**[[7]](#footnote-7)**).**
2. **The guidance acknowledges that:**

*“Not everyone will be able to make* ***and maintain*** *their claim online for a variety of good reasons.*

*(…)The method of contact must be reviewed regularly with the claimant to* ***ensure it remains*** *the most appropriate option.”*

(Emphasis added)

1. **In a Freedom of Information response dated 9th July 2019 (ref IR2019/24691)**[[8]](#footnote-8) **the Defendant indicated that this need for review applies to somebody who has online methods of contact – not only to somebody who has an existing non-digital relationship with the DWP, detailing contact options where a claimant is unable to access digital services:**

***For those claimants who are unable to access or use our digital services, assistance to make and maintain their claim is available via the Freephone Universal Credit helpline. Face-to-face support is also available in Jobcentres. In exceptional circumstances, a home visit can be arranged to support a claimant in making and maintaining their claim.***

**Other internal materials**

1. **In an internal DWP ‘improvement ticket’ (ref [IC-670544] Changing a digital claim to a phone claim Created: 2022-06-15),**[[9]](#footnote-9)made available in response to a Freedom of Information request, **a DWP staff member highlighted the clerical difficulties involved in turning an online account into paper and telephone account, since the online account cannot actually be closed and must instead be modified. However, in doing so s/he highlighted the availability of several different kinds of clerical ‘fix’ to turn an online account into a telephone and paper one.**

*We can change a phone claim to a digital but not a digital to a phone management system. I understand this question has been asked before and the answer has been that a switch cannot be made. I therefore suggest that we have a To Do that fall into the Payment Blockers that we can set up specifically for these types of claims EG Manual Print and Post Statement To Do. At the moment the only trigger we can use is the Make extra Frequency payt to do as its the only blocker title available- but we dont make pyts for the print and post ones we set up as reminders for the statements. This gives a false impression on the stats. IT makes no difference to the agent what title to do we use as long as its appears in the pyt trigger. It does make a difference to your stats. Ideally we would like to be able to switch from digital to phone as the option to do phone to digital works, but if not this would be the next best thing.*

**Grounds for judicial review**

**Ground 1: Failure to exercise discretion and/or take account of relevant information in not switching C from an online UC account to telephone and paper-based communication methods.**

1. The Defendant’s discretion over how to communicate, and receive communications, about an ongoing UC award is clearly set out in paragraph 1 of Schedule 2 UC (CP) Regs and elsewhere in the legislation, **and elaborated upon throughout her own guidance as set out above.**
2. C has provided the following evidence which confirms [her/his] significant restrictions as the result of [her/his health condition/disability] and their affect on [her/his] ability to manage [her/his] UC account online:
* X [evidence can include journal messages, phone calls etc. Include dates]
* Y
* Z
1. C’s inability to manage an online account is apparent from:
* X [list what has gone wrong: eg missed messages, missed appointments, sanctions]
* Y
* Z
1. S/he made this clear in [list messages, calls, reconsideration requests, complaint letters, etc concerning being moved to a phone and paper-based account].
2. However, these letters/requests have received no substantive response to date/have been refused [provide details].
3. Any decision not to switch C’s UC account to a telephone and paper-based system amounts to an unlawful failure to exercise the discretion available to the Defendant under paragraph 1 of Schedule 2 UC (CP) Regs and elsewhere **and to follow her own guidance as to when** to communicate with a claimant ‘non-digitally’. The Defendant is aware of C’s [disability/health condition] and its consequences.
4. **It is not open to the Defendant or her agents simply to tell a claimant that it is administratively impossible to switch from an online to a paper and telephone- based UC account: first, because this is incorrect as to what is administratively possible, as evidenced by her own guidance and by internal DWP communications as set out above; and second, and more importantly, because this approach amounts to unlawful fettering of her discretion through the application of a blanket policy, as well as failure to make reasonable adjustments (more below).**
5. Alternatively, if the Defendant has considered whether or not to take C’s account offline (ie, whether to exercise her discretion) and has decided not to, this would appear to amount to a clear failure to have regard to relevant information and material considerations (namely her own guidance, the medical evidence provided by C and her/his letters/calls/journal messages in which s/he has asked to move to ‘offline’ forms of contact) given that such factors all point strongly towards telephone and paper-based contact being appropriate.

**Ground 2: Failure to take account of guidance and make reasonable adjustments/disability discrimination**

1. The duty to make reasonable adjustments applies to the Defendant under s.21 EA 2010.
2. As above, the Defendant is aware of C’s condition and has been specifically advised of her/his needs.
3. In failing to take account of C’s condition and needs, and disregarding her/his request for her/his account to be administered on paper and by phone rather than online, the Defendant has failed to make reasonable adjustments or to follow her own guidance which acknowledges that “*Not everyone will be able to make and maintain their claim online for a variety of good reasons*.”
4. The Defendant has further not taken account of or adhered to her own guidance which states that *“If the claimant requires an adjustment to the way we send them information (for example, a notification) we must provide it in an alternative format that suits the claimant.”*
5. In failing to take account of C’s need for alternative methods of communication with the result that C cannot receive crucial information about her/his UC award such as decision notices and details of upcoming appointments**,** the Defendant has, in breach of s.20 EA 2010, put “*a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled”* and has unlawfully failed to take *“such steps as it is reasonable to have to take to avoid the disadvantage”.* Non-compliance with the duty to make reasonable adjustments under s.20 EA 2010 amounts to discrimination under s.21 EA 2010 and the Defendant has therefore *discriminated* *against* C on the grounds of her/his disability in breach of EA 2010.

**The details of the action that the defendant is expected to take**

**The Defendant is requested to:**

* Take all administrative steps necessary to switch C from having to use an online account, to receiving communication by [telephone and on paper] only. Ensure that the information C receives [by telephone and/or in writing] includes
	+ monthly UC calculation statements,
	+ all other decision notices
	+ all messages from the work coach
	+ information about all appointments or work-related requirements, including [her/his] claimant commitment
	+ information about suspensions or sanctions, and
	+ requests for information or evidence from C.
* Ensure vulnerable claimants are identified, their needs recorded and this record is available and referred to when both further contact is made by the Defendant or any of her agents (for example, health assessment providers).
* **Accept that C has been unlawfully discriminated against on the grounds of [her/his] disability contrary to the Equality Act and agree to pay [her/him] damages for the financial and non-financial loss, including injury to feeling, suffered as a result.**
* Issue clarified guidance to staff on accepting new UC claims by telephone, and on switching UC claimants from online to offline accounts for health or disability reasons, and ensure that this guidance is followed.
* Consider administrative improvements to make the process of switching an online account ‘offline’ as efficient as possible for DWP staff.
* Better publicise the option of making a new UC telephone claim by telephone, including by mentioning this option explicitly in managed migration notices.
* Ensure internal monitoring of decisions over when to accept a new claim by telephone.
* Ensure internal monitoring of decisions over whether to switch an existing claimant from an online to an offline account. In a Freedom of Information response dated 28th July 2022 the Defendant stated that data about the number of accounts switched ‘offline’ is not currently collected.[[10]](#footnote-10)
* Ensure that written communication from claimants is responded to within a reasonable time.
* Provide C with a written apology in respect of how his case has been handled and the failure to meet basic customer service standards plus conduct an internal review of the handling of [her/his initial attempt to start her/his UC claim by phone, her/his later request/s to ‘switch’ to an offline account, and her/his complaints].

**The details of documents that are considered relevant and necessary**

**Please find enclosed copies of the following documents:**

* **Signed form of authority for** the Claimant
* **[Copies of journal messages? Letters sent by C/adviser? DWP response letters/messages? Supporting medical evidence?]**

**ADR proposals**

**Please confirm in your reply whether the Defendant is willing to consider alternative dispute resolution.**

**The address for reply and service of court documents**

**Advice agency name and address, and email**

**Proposed reply date**

We expect a reply promptly and in any event no later than DATE (14 days).

**If we have not received a reply by this time we reserve the right to issue proceedings for judicial review without further notice to you.**

Yours faithfully,

1. assets.publishing.service.gov.uk/media/657c891d83ba380013e1b66c/List-of-Authorised-Government-Departments-under-s.17-Crown-Proceedings-Act-1947-15.12.2023.pdf [↑](#footnote-ref-1)
2. gov.uk/government/organisations/government-legal-department [↑](#footnote-ref-2)
3. [www.whatdotheyknow.com/request/751474/response/1786249/attach/4/Spotlight%20on%20Claims%20by%20phone.pdf?cookie\_passthrough=1](http://www.whatdotheyknow.com/request/751474/response/1786249/attach/4/Spotlight%20on%20Claims%20by%20phone.pdf?cookie_passthrough=1) [↑](#footnote-ref-3)
4. [www.rightsnet.org.uk/?ACT=39&fid=30&aid=2045\_jGjh2JoSW6vattrnE4vI&board\_id=1](http://www.rightsnet.org.uk/?ACT=39&fid=30&aid=2045_jGjh2JoSW6vattrnE4vI&board_id=1) [↑](#footnote-ref-4)
5. [data.parliament.uk/DepositedPapers/Files/DEP2022-0452/119-Reasonable\_Adjustments\_V4.0.pdf](https://data.parliament.uk/DepositedPapers/Files/DEP2022-0452/119-Reasonable_Adjustments_V4.0.pdf) [↑](#footnote-ref-5)
6. [data.parliament.uk/DepositedPapers/Files/DEP2022-0452/107-Non\_digital\_relationships\_V3.0.pdf](https://data.parliament.uk/DepositedPapers/Files/DEP2022-0452/107-Non_digital_relationships_V3.0.pdf) [↑](#footnote-ref-6)
7. See §8 of [*PP v SSWP (UC)* [2020] UKUT 109 (AAC)](https://assets.publishing.service.gov.uk/media/5e997186d3bf7f0322a79509/CUC_1389_2019.pdf) [↑](#footnote-ref-7)
8. [www.whatdotheyknow.com/request/584639/response/1390269/attach/html/2/FOI2019%2023269%20Reply.pdf.html](http://www.whatdotheyknow.com/request/584639/response/1390269/attach/html/2/FOI2019%2023269%20Reply.pdf.html) [↑](#footnote-ref-8)
9. Third entry at [www.whatdotheyknow.com/request/866985/response/2067364/attach/5/First%203%20improvement%20tickets%20redacted%2043314.pdf?cookie\_passthrough=1](http://www.whatdotheyknow.com/request/866985/response/2067364/attach/5/First%203%20improvement%20tickets%20redacted%2043314.pdf?cookie_passthrough=1) [↑](#footnote-ref-9)
10. [www.whatdotheyknow.com/request/878527/response/2090881/attach/3/Response%20FOI2022%2055235.pdf?cookie\_passthrough=1](http://www.whatdotheyknow.com/request/878527/response/2090881/attach/3/Response%20FOI2022%2055235.pdf?cookie_passthrough=1) [↑](#footnote-ref-10)