

Freedom of Information Act 2000 (Section 50)

Decision Notice

Date: 4 May 2010

Public Authority: Land Registry
Address: 32 Lincoln's Inn Fields
London
WC2A 3PH

Summary

The complainant requested the full source codes for a number of different computer applications used by the public authority and additional information in relation to three separate programs. The public authority withheld information, citing the exemptions at sections 29(1)(b), 43(1), and 43(2) of the Act. However, during the course of the Commissioner's investigation, the public authority agreed to disclose the information held in relation to the three programs. The Commissioner finds that the public authority correctly withheld the relevant source codes on the basis of the section 29(1)(b) exemption, and in all the circumstances of the case, the public interest in disclosure did not outweigh the public interest in maintaining the exemption. In light of this finding, the Commissioner did not consider the applicability or otherwise of the other exemptions cited. He however finds the public authority in breach of sections 10(1) (Time for compliance with request), 17(1)(b), and 17(3)(b) (Refusal of request).

The Commissioner's Role

1. The Commissioner's duty is to decide whether a request for information made to a public authority has been dealt with in accordance with the requirements of Part 1 of the Freedom of Information Act 2000 (the "Act"). This Notice sets out his decision.

The Request

2. On 02 June 2008, the complainant made the following requests:

1. The full source code of the following systems:
 - a) Data dictionary Client server scanner (system name DDCS)
 - b) Development Utilities (system names DVUT and RUT) [1]
 - c) Live Utilities (system name LVUT) [1]
 - d) Mainframe program scanning system (system name DDAL)
 - e) Electronic discharge and data synchronisation tester system (system name EDDY).
 - f) Land Charges Form Print System (system name LFPT)
 - g) Operator Help Facility (system name RECA)
 - h) Data Dictionary Mainframe program scanning system (system name DDAU)
 - i) Computer mapping link data format conversion system (system name CMSL)
 - j) Project file monitor system (system name SSPM).
2. A list of Common Programs (system name RCD).
3. A list of Common Components (system name COMN).
4. A copy of all RFCs for One Off Programs (system name QPRG).
3. On 11 June 2008, the public authority responded and explained that it considered all of the information caught by the requests to be exempt from disclosure on the basis of sections 29 and 43(2) of the Act.
4. On 22 June 2008, the complainant requested a review of the public authority's decision.
5. On 11 July 2008, the public authority wrote back with details of the outcome of the internal review. It upheld the application of sections 29 and 43(2) to the withheld information.

The Investigation

Scope of the case

6. On 20 July 2008 the complainant contacted the Commissioner to complain about the way his request for information had been handled. The complainant provided a detailed explanation as to why he considered the public authority had misapplied the exemptions at sections 29 and 43(2).
7. In summary, the complainant argued that the associated risk of hacking into the public authority's computer systems was 'negligible or zero'. He also went on to explain that the computer systems referred to in his requests were used internally to support the software

development team, did not process any business data of a confidential nature, and were of such a trivial nature that a competent IT professional would be able to produce an equivalent program independently.

8. The complainant also asked the Commissioner to consider the possibility of the disclosure of a redacted version of the information requested.
9. However, for reasons explained below, the Commissioner's investigation only covered item 1 (a – j) of the requests.

Chronology

10. On 29 September 2009 the Commissioner wrote to the public authority. He invited the public authority to provide additional submissions in respect of the application of the exemptions. The Commissioner also asked the public authority to provide him with copies of the withheld information.
11. On 22 December 2009 the public authority responded. It clarified that it had relied specifically on the exemption at section 29(1)(b) of the Act as well as section 43(2) and went on to explain the rationale for the application of the exemptions including the public interest in non-disclosure. The public authority also argued that it now considered section 43(1) also applied to the withheld information.
12. On 11 January 2010 the public authority provided the Commissioner with copies of some of the withheld information on an encrypted CD. On 02 February 2010 it provided the Commissioner with the remainder of the information also on an encrypted CD.
13. On 11 February 2010 the Commissioner wrote to the public authority. He amongst other things sought additional clarification in relation to the rationale for withholding the information held in respect of items 2, 3, and 4 of the requests.
14. On 19 February 2010 the public authority responded. It informed the Commissioner that it had decided to disclose the relevant information held in relation to items 2, 3, and 4 of the requests but maintained the original decision not to disclose the remainder of the information.
15. On 25 February 2010 the public authority disclosed to the complainant the information held in relation to items 2, 3, and 4 of the requests. It is for this reason that the scope of the investigation was restricted to item 1 (a – j) of the requests. The Commissioner's decision not to

continue the investigation in respect of the disclosed information is consistent with the Commissioner's Robust Approach to FOI Cases¹.

Findings of fact

16. A Trading Fund is a UK Government department, or an executive agency or part of the department, which has been established as such by means of a Trading Fund Order made under the Government Trading Funds Act 1973. One may only be set up where more than 50 per cent of the trading fund's revenue will consist of receipts in respect of goods and services provided by the trading fund. The significance of a trading fund is that it has standing authority under the 1973 Act to use its receipts to meet its outgoings.
17. Critical National Infrastructures commonly refer to assets that are essential for a country to function both as a society and an economy. Facilities which are commonly associated with the term include financial services, water supply, electricity, security etc.

Analysis

Exemptions

18. A full text of all the statutory provisions referred to below can be found in the Legal Annex to this Notice.

Section 29(1)(b)

19. Information is exempt from disclosure on the basis of section 29(1)(b) if its disclosure under the Act would or would be likely to prejudice the financial interests of the government of the United Kingdom.
20. The exemption actually refers to the financial interests of 'any administration in the United Kingdom, as defined by section 28(2)'. The 'government of the United Kingdom' is included in the definition in section 28(2). The Scottish Administration, and the Executive Committee of the Northern Ireland Assembly and the Welsh Assembly Government are the remaining administrations covered under section 28(2).

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http://www.ico.gov.uk/upload/documents/library/freedom_of_information/forms/a_%20robust_%20approach_%20to_%20foi_%20complaint_%20cases001.pdf

21. The public authority explained that as well as being a government department, it has also been established as a trading fund. It is therefore required to ensure that all of its expenditure is covered by the revenue generated from its fees or receipts. The public authority argued that the ability of financial institutions to lend huge sums of money quickly and efficiently on the security of lands and buildings is at the heart of the nation's economy and financial services. It explained that there are over 21 million registered titles in England and Wales and that a stable and effective land registration system provides the cornerstone of a healthy and functioning economy.
22. According to the public authority, knowledge of the source codes could potentially allow a computer hacker to make intelligent guesses about the design of its database and computer systems. It argued that such a person could potentially combine this with other information obtained legally or illegally, ultimately compromising the security and integrity of its systems. This, the public authority argued, would have a severe adverse effect on the confidence of the business community, particularly the banking community.
23. The public authority was keen to impress on the Commissioner that because the revenue generated from the databases ran into hundreds of millions in pounds annually, any compromise of the system through hacking would have serious implications on its revenue base and consequently the UK's financial interests.

Prejudice Test

24. The exemption at section 29(1)(b) is prejudice based. In effect this means that it can only be engaged if there is a likelihood of harm to the interest(s) the exemption seeks to protect.
25. In *Hogan v the ICO and Oxford City Council* (EA/2005/0026 & EA/2005/0030), the Information Tribunal (Tribunal) stated that "The application of the 'prejudice' test should be considered as involving a number of steps. First, there is a need to identify the applicable interest(s) within the relevant exemption.....Second, the nature of 'prejudice' being claimed must be consideredA third step for the decision-maker concerns the likelihood of occurrence of prejudice. " (Paragraphs 28 to 34).
26. The public authority considers that the disclosure of the source codes could potentially lead to a compromise of a title registration system (a primary component of its database) which is heavily relied on by both title holders and financial institutions for secured lending purposes. As was recently evident, the reluctance of financial institutions to offer credit to consumers (including the government) could adversely affect

both the financial and economic interests of the United Kingdom. In addition, the inability of the public authority to carry out its duties as a result of any compromise of its computer systems could also have a hugely negative impact on the financial interests of the government.

27. The Commissioner notes that in places the arguments provided by the public authority are more relevant to section 29(1)(a) – the economic interests of the UK rather than 29(1)(b) which covers the financial interests of the UK government. As the public authority has only cited section 29(1)(b) the Commissioner has focused on prejudice to the interests specified in the exemption. However, he does, accept that there will often be an overlap between the interests in (a) and (b). For example; a significant impact on the economic interests of the UK (the whole or part of the UK) could plausibly have an impact on the tax revenues and financial interests of the UK Government.

Likelihood of Prejudice (would or would be likely to)

28. In its letter of 11 July 2008 to the complainant (outcome of internal review), the public authority explained that it considered the risks posed by disclosure of the information requested to be 'real and significant'. (Quoting from the Tribunal in *John Connor Press Associates Limited v The Information Commissioner – EA/2005/0005* at paragraph 15).
29. In the Commissioner's letter of 29 September 2009, he asked the public authority to be explicit regarding the level of prejudice anticipated. The public authority's response did not however address this point.
30. However, based on the public authority's representations to the Commissioner in its response of 22 December 2009 as well as the explanation it provided to the complainant in its letter of 11 July 2008, the Commissioner is satisfied that the public authority was relying on the lower (would be likely to), rather than the higher level (would) of prejudice.
31. In any event, as pointed out by the Tribunal in the *McIntyre v The Information Commissioner & The Ministry of Defence (EA/2007/0068* at paragraph 45), where a public authority does not designate the level of prejudice, the lower threshold would apply unless there is evidence to the contrary. The Commissioner is satisfied that the evidence in this case points to the lower rather than the higher level of prejudice.
32. The Commissioner also agrees with the Tribunal in case *EA/2005/0005* that 'Likely to prejudice' means that the possibility of prejudice should be real and significant.

33. A very substantial part of the source codes is written in computer programming language and therefore not meaningful to the non-technical reader. The Commissioner notes that source codes provide instructions to a computer system on how to perform certain functions. In simple terms, a computer source code would instruct a computer system on how to execute a specified action. Therefore, when considered alongside the functions performed by the public authority's databases (especially in relation to the registration of titles), it is highly likely that, if the source codes for the systems or programs requested found its way to a technical reader (who found a way to access the systems), it could result in a real and significant risk to the integrity of the public authority's database.
34. The Commissioner notes that on the face of it, the programs referred to in the complainant's requests do not appear to relate to the very sensitive parts of the public authority's database like the title registration component. The public authority actually described them as 'utility programs' but went on to argue that they were produced solely to support the development and testing of its internal production systems and in that sense relate to its most critical systems.
35. As the Commissioner understands it, unlike application programs, utility programs do not actually enable the user to carry out actions on a computer system but focus on how the computer system operates and are therefore naturally targeted at the technical individual.
36. The Commissioner agrees with the public authority that knowledge of how its computer infrastructure operates could, if combined with additional information potentially compromise the integrity of its database. He is persuaded that this information would be valuable to a technical reader with intentions of hacking into or compromising the public authority's database in any other way. The nature of the information in the database (i.e. relating to titles for lands and buildings) also strongly suggests that the possibility of someone attempting to hack into the database is likely and certainly more than remote. The public authority did explain that it experiences between 20 – 30,000 general internet threats to its systems daily and that it had also been subject to more specific and focussed threats. The Commissioner accepts that the availability of the sources codes would offer encouragement to those who wished to breach the security the land registry's systems and then compromise the operation of the systems by attacking the source code.

37. The Commissioner is also mindful of the fact that the public authority is part of the United Kingdom's Critical National Infrastructure. According to the public authority, this comes with certain expectations and requirements as to how to protect its database. The Commissioner has therefore also attached some weight to this fact in assessing the likelihood and substance of the prejudice. The integrity of the register for titles in relation to lands and buildings is undoubtedly critical to the financial interests of the public authority. The registration of lands and buildings is, as already noted, a primary source of revenue for the public authority. The Commissioner accepts that the source code information could be used to comprise core systems if security was breached and it could follow that the public authority would be unable to generate revenue from the registration of titles as a result of a compromise of its computer systems, the consequent financial burden would have to be borne by the government. As noted above, if the systems were significantly comprised this could also have a knock on effect on economic areas where the sale and purchase of land is a core activity. This could also impact on tax revenues the UK government receives.
38. In light of the above, the Commissioner is persuaded that the disclosure of the source codes for the systems requested would have posed a real and significant risk to the financial interests of the public authority and consequently that of the United Kingdom. The Commissioner therefore finds that the exemption at section 29(1)(b) was correctly engaged.

Redaction

39. The public authority explained that without a great deal of redaction, the source codes would still be useful to potential hackers and leave its database vulnerable. On the other hand, it argued that large scale redactions would render the remainder of the source codes meaningless. To simplify, it explained that redaction on such a scale could leave a passage of text with nothing more than a series of unrelated words with significant gaps in between.
40. As with most documents the Commissioner accepts that there is a possibility that not every piece of information on the CDs would be caught by the exemptions relied on. However, he would argue that since the request is for the source codes for specific programs, it seems highly unlikely that any unredacted information would still be meaningful to the complainant in that they would not on their own constitute the source codes requested.
41. To conclusively determine which information is not sensitive and could consequently be disclosed under the Act, the Commissioner would need

to engage the services of an experienced programmer to interpret the source codes. The Commissioner does not however consider that this would be a proportionate use of his resources in light of the very strong possibility that the information which would subsequently be disclosed would not constitute a meaningful form of the source codes requested by the complainant. The Commissioner is nevertheless mindful of the fact the Act applies to the disclosure of all information not just what is considered to be useful information. However, in the circumstances of the case, he is persuaded that a providing a redacted version of the source codes would not be a reasonable matter to investigate.

Public Interest Assessment

42. Section 29(1)(b) is a qualified exemption which means that it is subject to a public interest test. The Commissioner must therefore determine whether in all the circumstances of the case, the public interest in disclosure outweighs the public interest in maintaining the exemption.

Public interest arguments in favour of disclosing the requested information

43. In both its refusal notice and letter containing the outcome of the internal review, the public authority did not set out the public interest factors for disclosing or withholding the requested information.
44. In its representations to the Commissioner, the public authority explained why it considered the public interest was in favour of withholding the information but did not set out any arguments in favour of disclosure.
45. The complainant however argued that there was a public interest in verifying the competence of the public authority's computer programmers and in his view, the best way to achieve this would be to examine the end product of their work (i.e. the source codes).
46. He additionally argued that since there is a possibility that part of the source codes may be useful externally, it is in the public interest that the public is granted access to the relevant source codes which as taxpayers, they could then use for their own private needs.
47. In *Guardian Newspapers Ltd and Heather Brooke v The Information Commissioner and BBC* (EA/2006/0011 and EA/2006/0013), the Tribunal commented on the general public interest in openness. According to the Tribunal;

'While the public interest considerations in the exemption from disclosure are narrowly conceived, the public interest considerations in favour of disclosure are broad-ranging and operate at different levels of abstraction from the subject matter of the exemption. Disclosure of information serves the general public interest in the promotion of better government through transparency, accountability, public debate, better public understanding of decisions, and the informed and meaningful participation by the public in the democratic process.' (Paragraph 87).

48. In addition to the broad public interest considerations in favour of disclosure identified by the Tribunal, the Commissioner considers that there is a specific public interest in knowing that the source codes requested are not written in such a way to make them vulnerable and consequently make it easier to attack the public authority's systems and compromise the integrity of its database. Any perceived vulnerability of the public authority's systems would undermine stakeholders' confidence in the both the security and quality of its database. Therefore, addressing any perceived flaws would obviously be in the public interest.

Public interest arguments in favour of maintaining the exemption

49. The Commissioner has accorded weight to protecting the UK Government (and UK tax payers) from the substantial prejudicial effects of disclosure, as identified above. The public authority also explained that it would not be in the public interest to jeopardise the security and integrity of its data which is all held electronically. It explained that because it provides a compensation scheme for persons who suffer loss as a result of errors in its register, it did not consider it to be in the public interest to increase its exposure to such a financial risk by the disclosure of the source codes requested.

Balance of the public interest arguments

50. As he has already noted, the public authority is designated as a critical infrastructure by virtue of amongst other things the sensitivity and importance of its database. If the database were to be compromised, there is a strong likelihood that this would result in adverse financial consequences not just for the public authority and the UK government.
51. The Commissioner is not aware of any evidence that the competence of the public authority's programmers has been questioned by relevant experts or there any significant technical problems with the systems. It is reasonable to conclude, that for critical national infrastructure, stringent procedures are in place to ensure that standards are met in developing programs. Source codes created, as part of a system within

the critical national infrastructure would be subject to quality checks to ensure their suitability for the tasks required. He has accorded arguments in favour of the public scrutinising the source code only limited weight. He has also accorded only limited weight to the argument that disclosing the code to the public, enabling them to reuse the source code for their own systems would be of benefit. He can see no strong benefits from reusing the code in question. The Commissioner also notes that reuse could still be subject to copyright restrictions. The Commissioner notes that his findings on the public interest in disclosure is on the circumstances of this case, in other cases disclosing code or other information from IT systems might offer significant public benefit.

52. The Commissioner has concluded that the public interest in maintaining the exemption is very strong given the substantial prejudice that would be caused to the UK government's financial interests. Whilst the Commissioner accepts the weight would be higher if the interests would be prejudiced rather than would be likely to, he has still accorded very strong weight to maintaining the exemption given the severity of the prejudice.
53. Therefore, having carefully considered the public interest arguments for and against disclosure, the Commissioner is persuaded that in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosure.

Sections 43(1) and 43(2)

54. In light of the Commissioner's finding in respect of the application of section 29(1)(b), he has not gone to consider the applicability or otherwise of the section 43 exemptions.

Procedural Requirements

55. A public authority is required by virtue of section 17(1)(b) to specify the exemption it is relying on to withhold requested information.
56. The Commissioner finds the public authority in breach of section 17(1)(b) for failing to specify the relevant subsection of section 29 within 20 working days.
57. Where a public authority is relying on a qualified exemption, section 17(3) also places a requirement on a public authority to set out its public interest reasoning to the complainant in its refusal notice or within a reasonable time.

58. The Commissioner finds the public authority in breach of section 17(3) for failing to clearly explain to the complainant, the public interest reasons for withholding the requested information.

The Decision

59. The Commissioner's decision is that the public authority dealt with the following elements of the request in accordance with the requirements of the Act:
60. The public authority correctly withheld the source codes on the basis of the exemption at section 29(1)(b).
61. However, the Commissioner has also decided that the following elements of the request were not dealt with in accordance with the Act:
62. The public authority breached section 17(1)(b) for failing to specify the subsection at section 29 within 20 working days.
63. The public authority also breached section 17(3) for failing to clearly explain to the complainant, the public interest reasons for withholding the requested information.

Steps Required

64. The Commissioner requires no steps to be taken.

Right of Appeal

65. Either party has the right to appeal against this Decision Notice to the First-Tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)
GRC & GRP Tribunals
PO Box 9300
Arnhem House
31 Waterloo Way
Leicester
LE1 8DJ

Tel: 0845 600 0877
Fax: 0116 249 4253
Email: informationtribunal@tribunals.gsi.gov.uk.
Website: www.informationtribunal.gov.uk

If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.

Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this Decision Notice is sent.

Dated the 4th day of May 2010

Signed

Steve Wood
Head of Policy Delivery

Information Commissioner's Office
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SK9 5AF

Legal Annex

Time for Compliance

Section 10(1) provides that –

“Subject to subsections (2) and (3), a public authority must comply with section 1(1) promptly and in any event not later than the twentieth working day following the date of receipt.”

Section 10(2) provides that –

“Where the authority has given a fees notice to the applicant and the fee paid is in accordance with section 9(2), the working days in the period beginning with the day on which the fees notice is given to the applicant and ending with the day on which the fee is received by the authority are to be disregarded in calculating for the purposes of subsection (1) the twentieth working day following the date of receipt.”

Section 10(3) provides that –

“If, and to the extent that –

- (a) section 1(1)(a) would not apply if the condition in section 2(1)(b) were satisfied, or
- (b) section 1(1)(b) would not apply if the condition in section 2(2)(b) were satisfied,

the public authority need not comply with section 1(1)(a) or (b) until such time as is reasonable in the circumstances; but this subsection does not affect the time by which any notice under section 17(1) must be given.”

Section 10(4) provides that –

“The Secretary of State may by regulations provide that subsections (1) and (2) are to have effect as if any reference to the twentieth working day following the date of receipt were a reference to such other day, not later than the sixtieth working day following the date of receipt, as may be specified in, or determined in accordance with the regulations.”

Section 10(5) provides that –

“Regulations under subsection (4) may –

- (a) prescribe different days in relation to different cases, and
- (b) confer a discretion on the Commissioner.”

Section 10(6) provides that –

"In this section –
"the date of receipt" means –

- (a) the day on which the public authority receives the request for information, or
- (b) if later, the day on which it receives the information referred to in section 1(3);

"working day" means any day other than a Saturday, a Sunday, Christmas Day, Good Friday or a day which is a bank holiday under the Banking and Financial Dealings Act 1971 in any part of the United Kingdom."

Refusal of Request

Section 17(1) provides that -

"A public authority which, in relation to any request for information, is to any extent relying on a claim that any provision of Part II relating to the duty to confirm or deny is relevant to the request or on a claim that information is exempt information must, within the time for complying with section 1(1), give the applicant a notice which -

- (a) states that fact,
- (b) specifies the exemption in question, and
- (c) states (if that would not otherwise be apparent) why the exemption applies."

Section 17(2) states –

"Where–

- (a) in relation to any request for information, a public authority is, as respects any information, relying on a claim-
 - (i) that any provision of part II which relates to the duty to confirm or deny and is not specified in section 2(3) is relevant to the request, or
 - (ii) that the information is exempt information only by virtue of a provision not specified in section 2(3), and
- (b) at the time when the notice under subsection (1) is given to the applicant, the public authority (or, in a case falling within section 66(3) or (4), the responsible authority) has not yet reached a decision as to the application of subsection (1)(b) or (2)(b) of section 2,

the notice under subsection (1) must indicate that no decision as to the application of that provision has yet been reached and must contain an estimate of the date by which the authority expects that such a decision will have been reached."

Section 17(3) provides that -

"A public authority which, in relation to any request for information, is to any extent relying on a claim that subsection (1)(b) or (2)(b) of section 2 applies must, either in the notice under subsection (1) or in a separate notice given within such time as is reasonable in the circumstances, state the reasons for claiming -

(a) that, in all the circumstances of the case, the public interest in maintaining the exclusion of the duty to confirm or deny outweighs the public interest in disclosing whether the authority holds the information, or

(b) that, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information."

Section 17(4) provides that -

"A public authority is not obliged to make a statement under subsection (1)(c) or (3) if, or to the extent that, the statement would involve the disclosure of information which would itself be exempt information.

Section 17(5) provides that –

"A public authority which, in relation to any request for information, is relying on a claim that section 12 or 14 applies must, within the time for complying with section 1(1), give the applicant a notice stating that fact."

Section 17(6) provides that –

"Subsection (5) does not apply where –

- (a) the public authority is relying on a claim that section 14 applies,
- (b) the authority has given the applicant a notice, in relation to a previous request for information, stating that it is relying on such a claim, and

- (c) it would in all the circumstances be unreasonable to expect the authority to serve a further notice under subsection (5) in relation to the current request."

Section 17(7) provides that –

"A notice under section (1), (3) or (5) must –

- (a) contain particulars of any procedure provided by the public authority for dealing with complaints about the handling of requests for information or state that the authority does not provide such a procedure, and
- (b) contain particulars of the right conferred by section 50."

The economy.

Section 29(1) provides that –

"Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice-

- (a) the economic interests of the United Kingdom or of any part of the United Kingdom, or
- (b) the financial interests of any administration in the United Kingdom, as defined by section 28(2)."

Section 29(2) provides that –

"The duty to confirm or deny does not arise if, or to the extent that, compliance with section 1(1)(a) would, or would be likely to, prejudice any of the matters mentioned in subsection (1)."

Commercial interests.

Section 43(1) provides that –

"Information is exempt information if it constitutes a trade secret."

Section 43(2) provides that –

"Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it)."

Section 43(3) provides that –

"The duty to confirm or deny does not arise if, or to the extent that, compliance with section 1(1)(a) would, or would be likely to, prejudice the interests mentioned in subsection (2)."