

Reference: 02279341

Information Requests
information.requests@ofcom.org.uk

2 October 2026

Freedom of Information request: Right to know request

Thank you for your request for information about Freshwater Strategy and/or Matthew Lesh.

We received this request on 4 September 2026 and we have considered your request under the Freedom of Information Act 2000 ("the FOI Act").

Your request

I would like to request information concerning engagement between Ofcom and Freshwater Strategy and/or Matthew Lesh.

For the period from 1 August 2024 to the date of this request, please provide:

*A list of meetings, calls or other substantive engagements involving Ofcom officials and:
Freshwater Strategy;
Freshwater Strategy Limited;
Freshwater Partners Pty Ltd;
Matthew Lesh.*

For each engagement, please provide the date, participants, organisations represented and subject/purpose, where recorded.

Copies of correspondence, meeting notes, agendas, presentations, briefing papers, research, polling or submissions received from the above concerning:

*the Online Safety Act;
implementation or enforcement of the Online Safety Act;
Ofcom's Online Safety Codes of Practice;
age assurance or age verification;
protection of children online;
freedom of expression;
privacy;
encryption;
illegal harms;
categorised services.*

Please include records where Freshwater Strategy or Matthew Lesh acted for, represented, accompanied, arranged an engagement for, or communicated on behalf of another organisation or client, including where the relevant record may consequently have been filed under that organisation's name.

Where already recorded by Ofcom, please identify the organisation or client represented by Freshwater Strategy or Matthew Lesh.

Our response

In response to the information requested, we consider that this is exempt under section 12 of the FOI Act. Section 12 of the FOI Act provides that a public authority is not obliged to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the “appropriate limit”. The appropriate limit is set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004, and is, for Ofcom, £450, which is equivalent to 18-hours. That sum is intended to cover the estimated costs involved in determining whether Ofcom holds the information requested, identifying, locating, retrieving and extracting the information from any document containing it. The Regulations provide that costs are to be estimated at a rate of £25 per person per hour.

In order to satisfy your request and provide the required information, we would need to analyse an estimated 600 files to determine if they fall within scope, and if they do, we would then need to manually extract and review the information, including any agendas, minutes and briefing notes, and assess and identify any information relevant to your request. This would take us beyond the 18-hour limit for complying with a request.

You may wish to consider submitting a narrower, more specific request, for example, by including more details of a specific meeting you are seeking or information about or specifying a narrower timeframe. We would then consider this under the FOI Act. Please note that without reference to context for the information you have requested, we are limited in our ability to suggest a more specific narrowed request. Should you decide to make a further request for information, please note the aforementioned appropriate limit and/or other exemptions may apply.

As a final point, we note that you have submitted five freedom of information requests on these topics within a short time period, some of which ask for the same, or very similar information. As an organisation, Ofcom has a finite number of resources and must optimise the use of these resources to ensure as many consumers as possible can receive the best level of service. Entering protracted correspondence over the same topic and providing the same information multiple times is not justified as an optimal use of our resources. Further correspondence in this manner may be considered to be vexatious under the FOI Act and may result in the issue of a refusal notice.

Yours sincerely,

Information Requests

Request an internal review

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress. Please email the Information Requests team (information.requests@ofcom.org.uk) to request an internal review.

Taking it further

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner's Office](#).