

Reference: 2025-066

Thank you for your email in which you requested the following information under the Freedom of Information Act 2000 (FOIA):

I am writing to request further information regarding the review of cases that used the Autonomy Introspect disclosure tool.

Please provide the following:

- 1. Copies of any or all documents or instructions given to those reviewing cases, for example details of the process to be followed.**
- 2. Copies of any or all internal handbooks or similar on use of disclosure tools more broadly**
- 3. In how many cases were term searches rerun as part of the review?**
- 4. Details of the seniority of the staff that have reviewed the cases.**

I am also seeking information about OpenText Axcelerate.

- 5. Which version of OpenText Axcelerate does the SFO run**
- 6. Please detail the cost of the tool.**

Response

Question 1

We have identified the documents you have requested. We consider that these documents attract the exemption under section 42 of the Freedom of Information Act 2000 (legal professional privilege). This is an absolute exemption and therefore does not require consideration of the public interest test.

However, while the documents themselves are exempt from disclosure, we recognise the public interest in providing some information about the review process. Therefore, we have provided you with some non-privileged information which explains how these reviews were conducted. This information has been shared with defendants and their legal teams already and is provided at Annex 1.

Question 2

In response to our request for clarification on 16 June, you stated: "I can confirm I am looking for both internal manuals on how Autonomy was used and current manuals providing guidance on using Axcelerate."

We confirm that we hold this information. However, this information is exempt from release under sections 31(1)(a), (b), and (c) and section 43 of the FOIA.

Section 31 provides that: *Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice—*

- (a) the prevention or detection of crime,*
- (b) the apprehension or prosecution of offenders,*
- (c) the administration of justice:*

How the exemption is engaged

Section 31 (a) (b) and (c) permit the exemption of information from release when the disclosure of the requested information may impact investigation and prosecution of criminal cases and the administration of justice.

As a law enforcement agency, the Serious Fraud Office (SFO) holds highly sensitive information which is of interest to others, including those we investigate. Releasing detailed information about how we approach the review of data and our strategy for investigating documents is highly sensitive and, if released to the public, could provide information which criminals could use to avoid detection and loopholes in the way in which we search material. Therefore, releasing detailed information about how we perform these searches could undermine the SFO's ability to protect our investigative techniques and information systems, thereby prejudicing the interests at (a), (b), and (c) above.

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).*

How the exemption is engaged

Axcelerate is a product that is currently on the market and releasing detailed information about how it can be used and information provided to us by OpenText could undermine its commercial interests.

Public interest test

The above-referenced sections are qualified exemptions and require consideration of whether, in all the circumstances of the case, the public interest in exempting this data outweighs the public interest in disclosing it. More information about exemptions in general and the public interest test is available on the ICO's website at www.ico.org.uk.

It is recognised that there is a general public interest in publicising information about the SFO, so that the public knows that serious fraud, bribery, and corruption are being investigated and prosecuted effectively, and so that the public can be reassured about the general conduct of our organisation and how public money is spent. The SFO already takes steps to meet this interest by publishing our [Annual Report and Accounts](#) and through our ICO-aligned Publication Scheme: [SFO publication scheme - GOV.UK](#).

However, having considered the public interest in releasing this information, we consider that the stronger interest lies in maintaining these exemptions of the FOIA. We understand the importance of publicising information about the SFO's use of public resources and funding.

However, the risk that this information could pose to the SFO's law enforcement functions against which it is essential to safeguard given the highly sensitive nature of the information held as a law enforcement agency. The SFO is a relatively small, highly specialised government department that is permitted by law to investigate only the most serious and complex cases of fraud and bribery affecting the UK. Releasing sensitive information about the way in which we conduct disclosure could risk compromising the SFO's ability to provide

and maintain data security for the cases at pre-investigation, investigation, prosecution stages and beyond.

Additionally, we do not believe that the release of those information which we hold would add significantly to these factors and therefore feel there is minimal public interest in releasing this material. Further, as outlined above, the SFO is compliant with the reporting requirements across government, which requires the publication of data surrounding procurement processes on the Contracts Finder website: [Contracts Finder - GOV.UK](https://contractsfinder.gov.uk).

Having considered the opposing arguments, we believe that the stronger public interest lies in exempting the information from release.

Question 3

At the date of your request, search terms have been re-run as part of the review on four cases. In all four cases, no material which might cast doubt upon the safety of the conviction was identified.

Question 4

All stage 1 and 2 reviews were conducted by an individual at civil service grade 6. Where a case has a decision-maker at stage 3, that individual is a lawyer of at least civil service grade 7.

Question 5

The SFO runs v23.4_430 of OpenText Axcelerate.

Question 6

The SFO paid a one-time cost for OpenText Axcelerate of £3,348,834.37.

The SFO pays £396,000 annually for renewing licence and maintenance. Additionally, the SFO pays monthly costs of around £60,000-90,000 for training and support. These payments are published in our transparency documents via our publication scheme.