



Government Legal Department

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Ref No: FOI 25_232

24 November 2025

Dear [REDACTED],

Thank you for your email of 20 October 2025 which contained your request for information. The Government Legal Department ("GLD") have processed your request for information under the Freedom of Information Act 2000 ("the Act").

Request

1. TOTAL PUBLIC EXPENDITURE

- Final total cost of the investigation
- Breakdown by expenditure category, including:
 - o Translation services
 - o Investigator costs
 - o Internal resources
 - o Other costs

2. EXPENDITURE APPROVAL TRAIL

- Full approval and sign-off chain for investigation expenditure categories, including:
 - o Names or roles/grades of all officials who authorized or signed off any part of the budget
 - o Authorization thresholds that triggered each level of sign-off required

SUPPORTING DOCUMENTATION:

3. TRANSLATION SERVICES PROCUREMENT

A. Contract Documentation:

- Purchase orders, contracts, or service agreements for Portuguese translation
- Tender documents or single-source justification forms
- Final contract value and authorization trail

B. Specification & Payment Records:

- Work specification outlining ~31 articles and 79 videos
- Invoices and payment records
- Name of service provider and date(s) of engagement

4. EXTERNAL INVESTIGATOR COSTS (Sept 2024-May 2025)

A. [REDACTED] (MOD Legal) Appointment:

- Appointment letter or terms of engagement for [REDACTED] as investigator
- Cost transfer records or billing documentation between MOD and receiving department (GLD/Defra)
- Total hours/days allocated and final amount charged for investigator services

B. Authorization Records:

- *Approval documentation for appointing external MOD investigator (including grade/role of approving officer)*
- *Business case or justification memo for cross-departmental investigator appointment*

5. BUDGETARY APPROVAL & ESCALATION RECORDS

A. Budget Documentation:

- *All budget approval forms or records, regardless of threshold*
- *Associated cost codes or cost center references*
- *The complete approval chain, including all signatories and authorizing officers*

B. Senior-Level Oversight:

- *Emails, meeting minutes, or internal correspondence discussing approval at Grade 6, SCS, or Cabinet level*
- *Any exceptional processes or external consultation (Treasury, Cabinet Office, MOD Legal approval)*

6. RESOURCE AND SCOPE DECISIONS

A. Financial Authorization for Scope Changes:

- *Approval documentation for investigation scope expansion (November 2024)*
- *Budget impact assessment for additional translation requirements and extended timeline*
- *Senior management sign-off for scope changes requiring additional resources*

B. Resource Allocation Decisions:

- *Business case or justification for commissioning extensive Portuguese translations*
- *Cost-benefit analysis comparing internal vs. external investigation resources*
- *Risk assessment documents relating to investigation budget allocation*

Response

Pursuant to Section 1(1)(a) of the Act, GLD informs you that it partially holds the information you have requested.

GLD holds only translator costs and invoices. The company providing the translation service was Campos Translation Limited and the total invoice of £4453.74 was paid to cover the costs of translating 35 articles (between 350 and 1500 words per article) and 20 videoclips between 3 and 10 minutes long from Portuguese to English. These costs were authorised by the Legal Director of DEFRA Legal Advisers and GLD HR. The reason for appointing a translator was that a potential outcome of the investigation was a finding of gross misconduct, and for that reason it was uncomfortable to be relying on AI translations. The translator was appointed from the membership of the Chartered Institute of Linguists and following the receipt of three quotes from different translators, as recommended by GLD's Legal Purchasing Guidance.

The investigator was a GLD employee therefore there were no additional costs associated to the investigation.

Your Rights

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original correspondence. Please use the contact details provided at the top of this letter in order to request an internal review relating to your original request.

Please remember to quote the reference number above in any future communications.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ICO.org.uk

Yours sincerely,

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