

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 19 April 2022

Public Authority: Department for Levelling Up, Housing and Communities

Address: Fry Building
2 Marshall Street
London
SW1P 4DF

Decision (including any steps ordered)

1. The complainant has requested information relating to a contract between the Department for Levelling Up, Housing and Communities ('the Department') and Faculty Science Limited ('Faculty').
2. The Department refused to disclose the information requested in accordance with section 40(2) (personal information) and section 43 (commercial interests) of FOIA.
3. The Commissioner's decision is that:
 - The Department is entitled to rely on section 40(2) as its basis for refusing to disclose the personal data requested.
 - Aspects of the report engage section 43(1) (trade secrets) and the public interest lies in maintaining the exemption.
 - The rest of the report engages section 43(2) and the public interest lies in disclosure.
4. The Commissioner requires the public authority to take the following steps to ensure compliance with the legislation.
 - Disclose the report, with all information that engages section 43(1) redacted.
5. The public authority must take these steps within 35 calendar days of the date of this decision notice. Failure to comply may result in the Commissioner making written certification of this fact to the High Court pursuant to section 54 of FOIA and may be dealt with as a contempt of court.

Background information

6. The Department was previously known as the Ministry of Housing, Communities & Local Government.
7. In April 2020 the Department awarded Faculty Science Limited¹ (Faculty) a £400,000 contract to help inform its response to the pandemic.² This contract was awarded without allowing competitors to make a bid due to the urgent and evolving nature of the pandemic.
8. A redacted version of the contract is in the public domain with the specifics of Faculty's role redacted. A statement of work is also in the public domain.
9. The Department has confirmed that Faculty's role was: to extract information from Local Resilience Forums (LRFs) and Government Liaison Officers (GLOs) and to undertake social media analysis in relation to the pandemic.
10. The social media analysis aspect of this work concerned privacy campaigners.³ There have also been reports in the media raising concerns that a private company is somehow able to influence government policy and questions raised about how the government manages conflicts of interests when it comes to tendering exercises.⁴ Faculty was awarded almost £3 million of government contracts between 2018 and July 2020.

Request and response

11. On 25 December 2020 the complainant requested the following information:

"Dear Ministry of Housing, Communities and Local Government,

¹ [Faculty - Intelligence that powers your organisation](#)

² [Data scientists for MHCLG Covid-19 response, contract amendment 01. - Contracts Finder](#)

³ [Government paid Vote Leave AI firm to analyse UK citizens' tweets | Data protection | The Guardian](#)

⁴ [Vote Leave AI firm wins seven government contracts in 18 months | Conservatives | The Guardian](#)

[Data scientists for MHCLG Covid-19 response, contract amendment 01.
- Contracts Finder](#)

please provide –

name of person who ordered the work be done
provide reports, summary, notes, guidance etc. created as a result of
the data collected by Faculty AI.

Please note that you have already supplied the raw data in
spreadsheets.”

12. The Department responded on 16 February 2021. It confirmed that ‘the name of the person who ordered the work to be done’ was exempt from disclosure in accordance with section 40(2) (personal information).
13. The Department also confirmed that it held a report by Faculty which was being withheld in accordance with section 43(1) and section 43(2). This report describes the two platforms built by Faculty in order to extract information and undertake social media analysis.
14. Following an internal review the Department wrote to the complainant on 6 April 2021. It upheld its original position.

Scope of the case

15. The complainant contacted the Commissioner on 6 April 2021 to complain about the way that their request for information had been handled.
16. The Commissioner considers the scope of his investigation to be to determine if the Department is correct when it says it is entitled to withhold the requested information in accordance with section 40(2) and section 43.

Reasons for decision

Section 40(2) - personal information

17. Section 40(2) of FOIA states:

“Any information to which a request for information relates is also exempt information if-

- (a) It constitutes personal data which does not fall within subsection (1), and

(b) The first, second or third condition below is satisfied.”

Subsection (1) refers to exempt information that constitutes personal data of which the applicant is the data subject.

18. In this instance the relevant condition is contained in section 40(3A)(a) which states:

“The first condition is that the disclosure of the information to a member of the public otherwise than under this Act-

(a) Would contravene any of the data protection principles.”

19. The first step for the Commissioner is to determine whether the withheld information constitutes personal data as defined by the Data Protection Act 2018 ('DPA18'). If this is not the case then section 40 cannot be used as a basis for refusing to disclose the information.

20. Secondly, and only if the Commissioner is satisfied that the requested information constitutes personal data, he must establish whether disclosure of that information would breach any of the data protection principles.

Is the requested information personal data?

21. Part 1, Section 3(2) of the DPA18⁵ defines personal data as:

“any information relating to an identified or identifiable living individual.”

22. The two main elements of personal data are that the information must relate to a living person and that the person must be identifiable from that information.

23. Information will relate to a person if it is about them, linked to them, has biographical significance for them, is used to inform decisions affecting them or has them as its main focus.

24. The information that is being withheld is the name of a junior civil servant. Originally, the Department confirmed to the Commissioner that this individual 'managed the contract for the report' in question.

25. Looking at the specific wording of part 1 of the request, the Commissioner felt it necessary to ask the Department to confirm that this individual was also the ultimate decision maker regarding the

⁵ [Data Protection Act 2018 \(legislation.gov.uk\)](https://legislation.gov.uk)

decision to award Faculty the contract. The Department confirmed 'the named individual in our submission had sole responsibility regarding the decision to award Faculty the contract in question.'

26. Since an individual's name clearly identifies them and relates to them, it is personal data.
27. The fact that information constitutes personal data does not automatically exclude it from disclosure under FOIA. The Commissioner must now consider whether disclosure of the requested information would contravene any of the data protection principles.
28. The most relevant data protection principle in this case is principle (a) which states that "Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject"⁶.

Would disclosure contravene principle (a)?

29. Personal data is processed when it is disclosed in response to the request. This means that a public authority can only disclose personal data in response to an FOI request if to do so would be lawful, fair and transparent.
30. In order to be lawful, one of the lawful bases listed in Article 6(1)⁷ of the UK General Data Protection Regulation (UK GDPR) must apply to the processing.

Lawful processing: Article 6(1)(f) of the UK GDPR

31. The Commissioner considers that the lawful basis most applicable is basis 6(1)(f) which states: "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data."

⁶ [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC \(General Data Protection Regulation\) \(Text with EEA relevance\) \(legislation.gov.uk\)](#)

⁷ [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC \(General Data Protection Regulation\) \(Text with EEA relevance\) \(legislation.gov.uk\)](#)

32. In considering the application of Article 6(1)(f) of the UK GDPR in the context of a request for information made under FOIA, it is necessary to consider the following three-part test:
33. **i) Legitimate interest test:** Whether a legitimate interest is being pursued in the request for information;
ii) Necessity test: Whether disclosure of the information is necessary to meet the legitimate interest in question;
iii) Balancing test: Whether the above interests override the legitimate interest(s) or fundamental rights and freedoms of the data subject.

The Commissioner considers that the test of 'necessity' under stage (ii) must be met before the balancing test under stage (iii) is applied.

Legitimate interest test

34. The Commissioner must first consider the legitimate interest in disclosing the personal data to the public and what purpose this serves. In considering any legitimate interest(s) in the disclosure of the requested information under FOIA, the Commissioner recognises that a wide range of interests may represent legitimate interests; they can be the requester's own interests as well as wider societal benefits. These interests can include the broad principles of accountability and transparency that underpin FOIA, or may represent the private concerns of the requestor.
35. It is important to remember that disclosure under FOIA is effectively disclosure to the world at large. The Commissioner is of the opinion that, if the requester is pursuing a purely private concern which is unrelated to any broader public interest then disclosure is unlikely to be proportionate. Legitimate interests may be compelling or trivial, but trivial interests may be more easily overridden by the fundamental rights and freedoms of the data subject during the test under stage (iii).
36. When the complainant raised their concern with the Commissioner they wrote 'The report costs £400k, there is a legitimate interest in knowing if a Minister ordered the expenditure of public funds.' In this case the complainant wants to know the name of the individual who authorised the Faculty contract.
37. It appears most likely to the Commissioner that the complainant is looking to establish the level of seniority at which this decision was taken. The Commissioner believes that there is a private, and wider, legitimate interest being pursued here.

Necessity test

38. The Commissioner must also consider if disclosure is necessary for the purpose that this legitimate interest represents or if there is an alternative method of doing so.
39. 'Necessary' means more than desirable but less than indispensable or absolute necessity. The necessity test is a means of considering whether disclosure under FOIA is necessary to meet the legitimate interest identified, or whether there is another way to do so that would interfere less with the privacy of individuals.
40. The Department has stated 'that the interests of the requester lie in the actual contents of the report. The contract manager for the report is a representative of the public authority and the identity of that individual can only be of extremely limited interest to the world at large.'
41. The Commissioner agrees to a certain extent. However, he notes that the complainant appears particularly concerned about the seniority of the figure who authorised this contract. This is not information that is within the public domain and therefore there are no less intrusive means of achieving the legitimate aims identified in stage (i).

Balancing test

42. Since the Commissioner is satisfied that disclosure is necessary for the purpose that this legitimate interest represents, he will now go onto consider whether the identified interests in disclosure outweigh the interests or fundamental rights and freedoms of the data subject.
43. For example, if the data subject would not reasonably expect that the information would be disclosed to the public under FOIA in response to the request, or if such disclosure would cause unjustified harm, their interests or rights are likely to override legitimate interests in disclosure.
44. In performing this balancing test, the Commissioner has considered the following
 - the potential harm or distress that disclosure may cause;
 - whether the information is already in the public domain;
 - whether the information is already known to some individuals;
 - whether the individual expressed concern to the disclosure; and
 - the reasonable expectations of the individual.
45. In the Commissioner's view, the balancing test should take into account whether the data subjects' concerned have a reasonable expectation

that their information would not be disclosed. This expectation may be influenced by a number of factors such as an individual's general expectation of privacy, whether the information relates to an employee in their professional role or to them as individuals, and the purpose which this personal information serves.

46. It is also important to consider whether disclosure would be likely to result in unwarranted damage or distress to that individual.
47. The information relates to the data subject's public, working life and not their private life. Even so, the Department has explained that 'As a junior civil servant, the individual concerned would not reasonably expect' their name to be placed in the public domain.
48. The Department has also explained that the data subject does not consent to the disclosure of their personal data in response to the request. It has not elaborated on this point any further.
49. The Department has stated 'The junior official concerned is not in a public facing role and therefore has an expectation that their name will not be put into the public domain. Even though the information relates to their public, rather than private, life the individual would have a reasonable expectation that this would not be disclosed, based upon established custom and practice.'
50. The Department has not discussed in its submission to the Commissioner any harm or distress that disclosure may cause the data subject. However, the Commissioner accepts that disclosure may cause distress, given that the data subject did not reasonably expect their personal data would be disclosed and expressly did not give their consent for this to happen.
51. The Commissioner finds it relevant in this case that the data subject is not in a public facing role. Were the data subject's name to be placed into the public domain they may be exposed to unwanted contact from those who have concerns or questions about the contract. Such concerns, the Commissioner notes, are most appropriately addressed to the Department as a whole, via a constituent's MP, and not the individual who managed the contract.
52. However, just because disclosure may cause distress to the data subject, and they may have a reasonable expectation that their personal data would not be disclosed, does not necessarily mean that a public authority should automatically discount the possibility. A public authority must always consider the individual circumstances of the case.

53. The Commissioner's guidance⁸ states 'the terms 'senior' and 'junior' are relative. It is not possible to set an absolute level across the public sector below which personal information is not released. It is always necessary to consider the nature of the information and the responsibilities of the employee in question.'
54. In this case, the data subject may be described by the Department as a junior civil servant but they also authorised the spending of £400,000 of public money. This decision affected the public as it involved social media analysis and helped to inform the Department's response to the pandemic.
55. The Commissioner's guidance makes it clear that 'The issue is not simply whether an employee has an expectation that their personal data is not disclosed, but whether that expectation is a reasonable one to hold.'
56. If the data subject is authorising contracts of this value, the Commissioner questions how junior they can be and how reasonable the expectation of their privacy is. A certain level of scrutiny is always to be expected when it comes to the spending, and appropriateness of that spending, of public funds. If the Department led the data subject to believe that their personal data would never be disclosed, it was unwise of it to do so.
57. The Commissioner notes that part of the complainant's aim behind this request was to establish if an MP authorised the contract. The Commissioner has had to take into account the circumstances of this case, including the role of the data subject, in order to conduct the balancing test. The individual is described by the Department as a junior civil servant and therefore this decision notice in itself actually goes some way to fulfilling the legitimate interest behind the request.
58. The Commissioner is mindful that the decision to award Faculty the contract was authorised by an individual but ultimately represents the decision of the Department and its governance framework. In this instance, the Commissioner does not consider the identified interests in disclosure outweigh the interests or fundamental rights and freedoms of the data subject. Further scrutiny of the contract, and the seniority of those who were or were not involved, can occur without the need for the identity of the data subject to be revealed.

⁸ [Requests for personal data about public authority employees \(ico.org.uk\)](https://ico.org.uk)

59. Therefore, the Commissioner considers that there is no Article 6 basis for processing and disclosure of the information would be unlawful. It is therefore the Commissioner's view that the Department has correctly applied section 40(2) to withhold the name of the individual who authorised the contract.
60. Having decided that disclosure would be unlawful, the Commissioner does not need to go on to separately consider whether disclosure would be fair or transparent.

Section 43 – commercial interests

61. Section 43 of FOIA states:

- (1) 'Information is exempt information if it constitutes a trade secret.'
- (2) '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).'

62. The Commissioner's guidance⁹ 'Section 43 - Commercial interests' states 'A commercial interest relates to a legal person's ability to participate competitively in a commercial activity. The underlying aim will usually be to make a profit. However, it could also be to cover costs or to simply remain solvent.'

63. The Department has applied both section 43(1) and section 43(2) in relation to the Faculty report that it holds. Section 43 is a qualified exemption. This means that even if the exemption is engaged, the information should be disclosed unless the public interest in doing so is outweighed by the public interest in maintaining the exemption.

64. As part of his investigation, the Commissioner has seen a copy of the report which details the two platforms built by Faculty in order to extract information and undertake social media analysis.

65. The Commissioner will first look at the Department's application of section 43(1).

Section 43(1) – trade secret

66. Section 43(1) is a class based exemption. This means that if information is a trade secret there is no requirement for a public authority to

⁹ [Section 43 - Commercial interests | ICO](#)

consider whether its disclosure would result in harm or prejudice in order for the exemption to be engaged.

67. FOIA does not define the term 'trade secret'. However, being guided by The Trade Secrets Regulations 2018,¹⁰ the Commissioner considers that, in order to be a trade secret information should:

- be secret, in the sense that it is not generally known among, or readily accessible to, people within the circles that normally deal with that information;
- have a commercial value, because it is secret. Its disclosure should also be liable to cause real (or significant) harm to the owner or be advantageous to any rivals, and;
- be subject to reasonable steps, under the circumstances, taken by the owner, to keep it secret.

68. Usually, a trade secret will either be a technical secret or a business secret.

69. The Department has stated 'Faculty has confirmed that **parts** of the report meet the criteria for a technical secret, as detailed in the ICO's guidance, and is used by them (Faculty) to achieve competitive advantage.' The Department has indicated to the Commissioner which specific information contained within the report engages section 43(1).

70. Having reviewed this information, the Commissioner agrees. A technical secret might outline a specific way of doing something, such as a recipe, formula, manufacturing process or technique. Aspects of the report break down Faculty's approach to designing the platforms, including the rationale behind the use of specific technology such as coding etc.

71. Looking at the withheld information, parts of the report provide a technical blueprint which details how Faculty approach data-science projects. The Department has explained that 'This level of technical methodology has not previously been made public for this or any similar commercial project.'

72. The Commissioner can see why; disclosure of this information would expose Faculty's intellectual property. This would cause harm to Faculty's commercial interests and would be advantageous to any rivals.

¹⁰ [The Trade Secrets \(Enforcement, etc.\) Regulations 2018 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

73. The Commissioner concurs that section 43(1) is engaged in relation to parts of the report and will go onto consider whether the public interest lies in disclosure or in maintaining the exemption later on in this notice.

Section 43(2) – prejudice commercial interests

74. The Commissioner's guidance states 'A commercial interest relates to a legal person's ability to participate competitively in a commercial activity. The underlying aim will usually be to make a profit. However, it could also be to cover costs or to simply remain solvent.'
75. In order for a prejudice based exemption such as section 43(2) to be engaged there must be likelihood that disclosure would, or would be likely to, cause prejudice to the interest that the exemption protects. In the Commissioner's view, three criteria must be met in order to engage a prejudice based exemption:
- Firstly, the actual harm which the public authority alleges would, or would be likely to, occur if the withheld information was disclosed has to relate to the applicable interests within the relevant exemption;
 - Secondly, the public authority must be able to demonstrate that some causal relationship exists between the potential disclosure of the information being withheld and the prejudice which the exemption is designed to protect. Furthermore, the resultant prejudice which is alleged must be real, actual or of substance; and,
 - Thirdly, it is necessary to establish whether the level of likelihood of prejudice being relied upon by the public authority is met – i.e. disclosure 'would be likely' to result in prejudice or disclosure 'would' result in prejudice.
76. In this case, the Department has confirmed that disclosure would harm the commercial interests of a third party – Faculty.

The applicable interests

77. The Department has explained that 'revealing commercially sensitive information about Faculty to its competitors would undermine the company's ability to compete effectively in its market.'
78. The Commissioner is satisfied that the arguments presented by the Department outline how disclosure would prejudice the applicable interests within the relevant exemption.

The nature of the prejudice

79. The Commissioner must now consider if there is a causal link between the information that is being withheld and the prejudice that section 43(2) is designed to protect.
80. The Commissioner notes that, as the prejudice represents something that has not happened, it is often difficult to provide evidence in support of the prejudice. To do so would require disclosure which would undermine the purpose of the exemption. However, the Commissioner must be satisfied that a causal relationship exists between the disclosure of the information being withheld and the prejudice which the exemption is designed to protect. It cannot be a mere assertion.
81. The Department has explained that 'disclosure would undermine trust and an effective working relationship between the company and the government.' The Commissioner believes that a certain level of scrutiny needs to be expected from organisations who provide services to public authorities, especially central government. Therefore the Commissioner does not accept this vague, generic argument.
82. The Department has also explained 'Faculty has confirmed to the Department that the release of this information effectively offer a blueprint for how they approach data science projects, such as this, using public data.'
83. The Commissioner has reviewed the withheld information and notes that the report breaks down, in detail, Faculty's approach to project delivery, the technology it uses including the rationale behind these decisions, the deliverables, outputs, detailed specifications and performance evaluations of the platforms it built, the costs and the possible future uses of the platforms.
84. To reiterate, the Department is withholding specific information, trade secrets, under section 43(1) and the report in its entirety under section 43(2).
85. The Commissioner acknowledges that all of the information contained within the report, both separately and accumulatively, are unique to Faculty and to disclose them would harm its commercial interests and place its competitors at an advantage. The Commissioner therefore considers the whole report is engaged by section 43(2) and will go onto consider whether the public interest lies in disclosure or in maintaining the exemption.

Likelihood of the prejudice

86. In its refusal notice to the complainant, the Department confirmed that it was relying upon the lower threshold of prejudice, disclosure 'would be

likely' to prejudice the commercial interests of Faculty. It then revised its position in its internal review, confirming that it was relying on the higher threshold of prejudice, disclosure 'would' prejudice Faculty's commercial interests.

87. The Department has maintained its reliance on this higher threshold of prejudice in its submission to the Commissioner. 'Would prejudice' means that, were the requested information to be disclosed, there is more than a 50% chance that the prejudice would occur.
88. The Commissioner understands that the Department contacted Faculty, who has confirmed this position.
89. Taking into account the value of the contract in question and the competitive nature of the data science and artificial intelligence field, the Commissioner accepts the Department's reliance on the higher threshold of prejudice.
90. Establishing the appropriate level of likelihood is important because it has an effect on the balance of the public interest test. The more likely that disclosure will result in prejudice, the more compelling the public interest arguments in favour of disclosure must be.

The public interest test

Public interest arguments in favour of disclosure

91. The Department 'understands that there will be public interest in the data science work carried out by Faculty. Providing further information gathered in this contract would enable the general public to better appreciate what work was being carried out.'
92. The above is the only public interest argument in favour of disclosure that the Department has put forward.
93. The Commissioner notes there is always a public interest in disclosure when it comes to holding public authorities accountable for how public money is spent. When the public has a clear understanding of how public money is spent it can increase confidence in a public authority's ability to allocate funds effectively. Alternatively, it can encourage public debate if value for money has not been delivered, or funds have been allocated inappropriately.
94. The Commissioner also notes that there is a public interest in encouraging competition amongst private companies for public sector contracts. Greater transparency about tendering processes or contracts may encourage more companies to submit a bid for work which, in turn, should help a public authority obtain the best value for money.

95. The Commissioner considers that there are strong public interest arguments in allowing the public access to information which sheds light on, or protects the public from, questionable practices or products. The Commissioner notes that, to date, the DPIA for this project work has not been published.

Public interest arguments in favour of maintaining the exemption

96. The Department has stated 'there is undoubtedly a public interest in allowing public authorities to withhold information which, if disclosed, would negatively affect the ability of third parties to negotiate or compete in a commercial environment.'
97. It has gone onto say that 'If the commercial interests of one of the players in the market were revealed, then its competitive position would be eroded and the whole market would be less competitive with the result that the public benefit of having an efficient competitive market would be to some extent eroded.'

The balance of the public interest arguments

98. In the Commissioner's view the balance of the public interest is very fine in this instance. He recognises the importance of maintaining an efficient competitive market, especially in the artificial intelligence and data science field which have been integral tools in responding to the pandemic. He also recognises the importance of openness and accountability, especially when it comes to the spending of public money.
99. The Commissioner has decided that the technical secrets (the information that engages section 43(1)) contained within the report should continue to be withheld. In the Commissioner's opinion, it is this specific information that would cause the most damage to Faculty, and the greatest advantage to its competitors, should it be disclosed. The Commissioner also does not consider it necessary to disclose these technical secrets in order to meet the public interest in disclosure. The public interest lies in understanding why and how the work was done, rather than the technical blueprints behind such work.
100. In relation to all other information contained within the report (that which engages 43(2) only), the Commissioner considers that the public interest in disclosure narrowly outweighs the public interest in maintaining the exemption.
101. In the Commissioner's opinion, the Department has underestimated the scrutiny of the contract in question. Firstly on the work that was being carried out and secondly on the fact that it was Faculty to whom the contract was awarded without a tendering process.

102. The Commissioner notes that the specifics of Faculty's role has been redacted from the information that is within the public domain. Disclosure of the report, which outlines how Faculty conducted its social media analysis, may help the public understand the work that was undertaken and why.
103. It is reasonable to the Commissioner that such analysis needed to happen urgently due to the urgent and evolving nature of the pandemic. However, this is not a reason to not present a full picture of the work undertaken.
104. Furthermore, disclosure would allow the public to decide, on their own, whether the decision to grant Faculty the contract was a sound one. It would also help to contextualise why Faculty was granted this specific contract, given the concerns about the conflicts of interest.

Right of appeal

105. 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,
LEICESTER,
LE1 8DJ

Tel: 0300 1234504
Fax: 0870 739 5836
Email: grc@justice.gov.uk
Website: www.justice.gov.uk/tribunals/general-regulatory-chamber

106. 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.

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

Signed

Alice Gradwell
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