

Filed on behalf of the Defendant/Applicant

Name of Witness: Keeley Louise Parry

No. of Statement: 1

Date: 23 October 2025

Exhibits: KLP1

CLAIM NO: KB-2025-001120

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

MEDIA AND COMMUNICATIONS LIST

B E T W E E N:

The Good Law Project Ltd

Claimant/Respondent

AND

Reform UK Party Limited

Defendant/Applicant

WITNESS STATEMENT OF KEELEY LOUISE PARRY

I, **KEELEY LOUISE PARRY**, of Griffin Law Limited, 60 Churchill Square, Kings Hill, West Malling, Kent, ME19 4YU will say as follows:

1. Introduction

1.1 I am an associate of Griffin Law Limited ("**Griffin Law**").

1.2 Griffin Law acts for the Defendant/Applicant, Reform (UK) Party Limited ("**the Defendant**") in these proceedings. I am one of the fee earners with day-to-day

conduct of this matter on behalf of the Defendant, subject to the overall supervision of the directors of Griffin Law.

1.3 I am duly authorised to make this statement on behalf of the Defendant.

1.4 The facts and matters set out in this statement are within my own knowledge unless otherwise stated. Where facts are not within my own knowledge, I have identified the source of that information.

1.5 In this witness statement I refer to the exhibit marked 'KLP1'. Unless otherwise stated, references to page numbers in this witness statement are to KLP1.

1.1 This statement is made in reply to the Claimant/Respondent's ("**the Claimant**") response to the Defendant's application to strike out the claim and/or for summary judgment, as set out in the witness statements of Matthew Getz ("**GETZ 3**"), Jolyon Maugham KC ("**MAUGHAM 1**"), and Duncan McCann ("**MCCANN 1**"), all dated 10 October 2025 (together, "**the Statements**").

2. Summary of the Defendant's Position

2.1 The Defendant maintains that the claim brought by the Claimant on 21 March 2025 ("**the Claim**") should be struck out pursuant to CPR 3.4(2)(a) and/or (b), and/or that summary judgment should be granted under CPR 24.2(a)(i), for the reasons set out in the Defendant's application and supporting evidence ("**the Application**").

3. Status of Good Law Project

3.1 I have searched online for material to corroborate the Good Law Project's objectives.

3.2 The preponderance of material that I have seen in my searching is consistent with it being a political organisation, albeit a non-party political organisation. In this regard, I follow the definition given in Wikipedia:

“A political organisation is any organisation whose primary purpose is involving itself in the political process, including political parties, non-governmental organisations, and special interest advocacy groups. Political organisations are those engaged in political activities (e.g., lobbying, community organizing, campaign advertising, etc.) aimed at achieving clearly defined political goals, which typically benefit the interests of their members.

While parties are one type of political organisation that may engage in some or all of those activities, they are distinct in that they typically focus on supporting candidates for public office, winning elections and controlling government.”

3.3 Thus, by way of example, a trade union is a political organisation that is formed to promote the interests of the workers whom it represents.

3.4 Although the activities of Good Law Project may be said to exist and to operate for the collective benefit of its members and those who support it (all of whom are, of course, members of the public), I have not been able to find evidence that it either exists or operates for the collective benefit of the public, i.e., including those who are not its members and who do not support it, or indeed are opposed to its activities. Indeed, quite the opposite. It regularly institutes and funds legal proceedings against organisations and bodies to whom it is opposed. For example:

(1) It brought a claim for judicial review challenging the lawfulness of the decisions of the Secretary of State for Health and Social Care to award contracts for the supply of personal protective equipment to Pharmaceuticals Direct Limited. Good Law Project lost that case: see *R (Good Law Project) v The Secretary of State for Health and Social Care* [2021] EWHC 1782.

(2) Similarly, *R (Good Law Project Ltd) v Secretary of State for Health and Social Care* [2022] EWHC 2468 (TCC), which Good Law Project also lost.

- (3) In *R (Good Law Project Ltd) v Secretary of State for Health And Social Care* [2019] EWHC 800 (Admin) it sought permission to challenge the making of regulation 9 of the Human Medicines (Amendment) Regulations 2019. Good Law Project lost.
- (4) It brought proceedings against the Electoral Commission for its decision not to open an investigation into campaign spending of, and donations received by, Vote Leave Limited and Mr Darren Grimes in connection with the referendum on membership of the European Union held on 23 June 2016. Good Law Project lost that case: see *R (Good Law Project) v The Electoral Commission* [2019] EWCA Civ 1567.
- (5) It brought proceedings against the Minister for the Cabinet Office seeking judicial review of his decision to award a contract to Public First Limited without public notice or competition, relying on Regulation 32(2)(c) of the Public Contracts Regulations 2015. Good Law Project lost that claim: *R (Good Law Project) v Minister for the Cabinet Office* [2022] EWCA Civ 21. As the Court of Appeal noted at [8] in overturning the order of the High Court, it was “*an unprecedented outcome: a party with no potential interest in a contract has not hitherto obtained a declaration of unlawfulness on the basis of apparent bias in respect of a decision by a public body to grant a private law contract.*”
- (6) It brought proceedings in relation to the duties owed in relation to public records under the Public Records Act 1958, and certain policies issued by Government departments in relation to the use and preservation of electronic communication. It lost those proceedings: *R (Good Law Project) v The Prime Minister & Ors* [2022] EWCA Civ 1580.

3.5 I have not seen anything to suggest that in bringing all these failed proceedings, Good Law Project was not acting in accordance with the objectives it has in its constitution (i.e., Articles of Association).

3.6 There have, of course, also been claims where Good Law Project has met with success, even if sometimes overturned on appeal. However, a body that, by virtue of its constitution, has objectives of mounting failed challenges to the decisions of public authorities, is not one that has objectives in the public interest. As noted by the Divisional Court in *R (Good Law Project v Prime Minister* [2022] EWHC 298 (Admin) at [57]:

“No individual, even with a sincere interest in public law issues, would be regarded as having standing in all cases. We do not consider that the position differs simply because there is a limited company which brings the claim. It also cannot be right as a matter of principle that an organisation could in effect confer standing upon itself by drafting its objects clause so widely that just about any conceivable public law error by any public authority falls within its remit.”

3.7 The Defendant does not call into question the sincerity of those behind Good Law Project. However, there is a difference between sincerity of belief and an organisation having objectives which are in the public interest. Parliament gives expression to what is in the public interest through its enactments, and when a public authority acts lawfully in the performance of statutory functions imposed or conferred by an enactment, it is not in the public interest for an organisation to impugn the lawfulness of those lawful acts. It is a time-consuming and wasteful distraction. That such challenges are permissible and indeed facilitated in a functioning democracy does not diminish the fact that they are time-consuming and wasteful for the public authority. Nor does the fact that a claimant makes such a challenge prove that that claimant is championing the cause of democracy and serving a wider public interest in so doing.

3.8 I have also searched the Information Commissioner’s website to see whether the Commissioner refers to Good Law Project’s work in this area. My searches unearthed a Decision Notice of 24 April 2025 (Reference: IC-347701-M6Y4) in which Good Law Project is referred to (para 8), but that has nothing to do with data protection. What that Decision Notice does expose is that Good Law Project has a track record of exaggerating its role in support of the public. See page 2 of KLP1.

3.9 At pp 27-55 of exhibit JTDM1, Mr Maugham helpfully exhibits original Articles of Association of Good Law Project. I was unable to find anything in there saying that Good Law Project has objectives which are in the public interest. Indeed, Article 3.1 starts:

“The objects for which the Company is established are:

3.1.1 carry on business as a general commercial company.

3.1.2 to carry on any other trade or business whatsoever which can, in the opinion of the Company, be advantageously carried on by the Company in connection with or ancillary to any of the general business of the Company or is calculated directly to benefit the Company or enhance the value of or render profitable any of the Company’s property or rights or is required by any customers of or persons dealing with the Company;

3.1.3 to purchase or by any other means acquire and take options over any property whatever, and any rights or privileges of any kind over or in respect of any property;

.....”

And so on. These Articles of Association do not mention protection of data subjects’ rights and freedoms or the protection of their personal data.

3.10 At paragraph 17 of Mr Maugham’s witness statement, he states that the original Articles of Association “*have undergone several revisions.*” This is not quite accurate. The position is this:

- (1) On 27 July 2018 the company passed a Special Resolution replacing the existing Articles of Association with new Articles of Association. A copy of these is at pages 56-79 of exhibit JTDM1.
- (2) On 15 February 2019 the company passed a Special Resolution replacing the existing Articles of Association with a new Articles of Association. A copy of these is at pages 80-104 of exhibit JTDM1. These Articles of Association do not mention protection of data subjects' rights and freedoms or the protection of their personal data. Nor do they mention objectives in the public interest.
- (3) On 15 December 2021 the company passed a Special Resolution replacing the existing Articles of Association with a new Articles of Association. A copy of these is at pages 105-124 of exhibit JTDM1. These Articles of Association do not mention protection of data subjects' rights and freedoms or the protection of their personal data. Nor do they mention objectives in the public interest. I note that whereas under Art 3A.5 of the 15 February 2019 Articles of Association Good Law Project was registered as a charity, it appears that that registration had by 15 December 2021 either lapsed or been revoked.

3.11 I would observe that on 27 July 2021 Mr Maugham ceased to be a director of Good Law Project. Nonetheless, Mr Maugham was the sole member of Good Law Project who was entitled to vote on the Special Resolution at (3) above. Mr Maugham remains the sole director of Good Law Practice Limited (company number 13849662), a private limited company, of which Good Law Project Limited is identified in Company House records as being the only active person with significant control (owning 75% or more of the shares in Good Law Practice Limited and having 75% or more ownership of voting rights, as well as the right to appoint or remove directors). As can be seen from Article 14 of its Articles of Association, Mr Maugham is entitled to such remuneration as he determines. The company has elected not to include a copy of the income statement within the financial statements of the company filed at Companies House. See page 22 of KLP1.

4. Pre-Action Protocol Compliance

4.1 The Claimant asserts that its Letter Before Action dated 8 October 2024 (“LBA”) [page 32 of **KLP1**] was compliant with the Pre-Action Protocol for Media and Communications (“PAP”). This is denied for the reasons detailed below.

4.2 The Data Subjects (as defined within the LBA) were not identified in the LBA:

4.2.1 The PAP requires that a LBA must provide:

4.2.1.1 “*any further information necessary to identify the data subject*”

4.2.1.2 “*sufficient details to identify the relevant processing*” and, crucially;

4.2.1.3 “*include details of the data subjects on whose behalf the claim would be brought; and, confirmation that they have mandated the representative body to represent them and receive compensation, where applicable.*”

4.2.2 Whilst the Claimant identifies itself and outlines its purported authority to act on behalf of the Data Subjects in general terms (as outlined at **GETZ 3**, paragraph 15), it fails to provide any information such that the Data Subjects it represents can be identified. Instead, the Claimant refers to the individuals collectively as a group of unnamed Data Subjects.

4.2.3 The LBA asserts (in a footnote to the LBA) that the Claimant “*understand[s] that approximately 1,800 Data Subjects' Requests were submitted between 5 June and 4 July 2024*” (my emphasis). It does not list or otherwise identify the individual Data Subjects, nor does it specify the exact number of the Data Subjects in question. The only identifying information included within the LBA is confirmation that each Data Subject submitted a notice titled “*Cease and desist notice under the Data Protection Act 2018 and the United*

Kingdom's General Data Protection Regulation" during that period (“**Cease and Desist Notices**”). At paragraph 17.1 of **GETZ 3**, Mr Getz claims that this was sufficient to identify the Data Subjects as it “*distinguish[es] such Notices from other requests [the Defendant] might have received*”.

4.2.4 However, paragraph 25 of **MCCANN 1** provides that “*of the 1,746 data subjects who sent requests to the Defendant, 51 chose to pursue a claim. It is the members of this group who have assigned their rights to Good Law Project to be a representative organisation under Art 80 (1) in order to take their cases forward.*” This is incompatible with Mr Getz’s position.

4.2.5 Despite the Claimant’s implication that the LBA was sent on behalf of “*approximately*” 1,800 Data Subjects (and the assertion in **GETZ 3** confirming that this sweeping statement was sufficient to identify the Data Subjects), in reality, the Claimant only had authority to act for 51 of the Data Subjects, i.e. the 2.8% of Data Subjects who sent the Cease and Desist Notices to the Defendant.

4.2.6 Therefore, the Claimant’s description of the Data Subjects falls materially short of the requirements of the PAP.

4.3 The LBA failed to substantiate the damage caused to the Data Subjects.

4.3.1 The PAP requires the LBA to specify “*the nature and any available details as to any particular damage caused or likely to be caused by the processing/breach of duty complained of*”.

4.3.2 The LBA, and indeed the Claim itself, fails to substantiate the “*concern, worry and uncertainty*” each of the Data Subjects has supposedly suffered. This has not been remedied in any of the Statements, and is notably absent from paragraph 17 of **GETZ 3**.

4.4 The data outlined in the LBA is inconsistent with the Claim brought.

4.4.1 At paragraph 3 of the LBA, the Claimant contends that:

“...we consider that Reform UK is (a) processing special category data unlawfully under Articles 6 and 9 of the UK GDPR, and (b) is in breach of Article 15 by failing to provide the Data Subjects with copies of their personal data.”

4.4.2 The substantive focus of the LBA appears to be the Claimant’s unsupported claim that the Defendant processed special category data of 1,800 unidentified Data Subjects. Of the 37 paragraphs of the LBA, 26 paragraphs relate to the allegation that the Defendant is processing such data, despite the Claimant omitting to formally plead this point, instead reserving its position.

4.5 Instead of replying to the Claimant, which, by its own evidence, had the requisite authority to act for only 2.8% of the Data Subjects, between 11 October 2024 and 14 October 2024, the Defendant replied to each of the 1,746 Cease and Desist Notices. This response ought to have concluded matters.

4.6 It is therefore clear that the assertion of the Claimant, at paragraph 13 of **GETZ 3**, that the LBA was compliant with PAP is ill-founded.

5. Merits of the Claim

5.1 The Statements fail to remedy the failure by the Claimant to disclose any reasonable grounds to bring its speculative, unsubstantiated claim.

5.2 Paragraph 20 of **MCCANN 1** confirms that the Cease and Desist Requests were part of a campaign in which 20,000 people contacted one (or more) of five of the largest UK political parties (“**the Political Parties Campaign**”). Notably, **MCCANN 1** fails to exhibit any evidence of such a campaign to confirm its

objectives and/or procedure. Without such documentation, and relying only on the limited information outlined at paragraphs 19 to 26 of **MCCANN 1**, it is unclear:

5.2.1 Whether the 20,000 people involved contacted political parties of their volition;

5.2.2 Whether that choice (or direction by the Claimant) was random or calculated; and/or

5.2.3 Whether the people involved even suspected that the political parties in question held any of their data.

5.3 The wording of **MCCANN 1** suggests that the selection process was wholly random, which is supported by the fact that the Defendant did not hold data belonging to any of the 1,746 Data Subjects.

5.4 **MCCANN 1** goes on to explain that, as the Defendant did not engage with the Political Parties Campaign, the Defendant failed to comply with its statutory obligations. This conclusion is not based on evidence but is founded on unsubstantiated conjecture on the part of the Claimant, specifically:

5.4.1 Paragraph 22 of the Particulars of Claim provides that the Claimant “*infers*” that, because of the Defendant’s general aim to maintain a profile for each registered voter in the UK, and because the Data Subjects represented by the Claimant are registered voters, the Defendant holds data belonging to the Data Subjects. Not only has the Claimant failed to adduce evidence to support this inference, but it has since confirmed (at paragraph 21 of **MCCANN 1**) that the Cease and Desist Notices were sent as part of the Political Parties Campaign; were sent, seemingly, at random; and were only sent to the Defendant because it is one of five of the largest political parties. The inference outlined by the Claimant in the Particulars of Claim is not only illogical but also appears to have been reached retrospectively.

- 5.4.2 Paragraph 32 of the Particulars of Claim outlines the Claimant's "belief" that the Defendant "may" have processed and "may" be continuing to process special category data. Despite the fact that the Claimant particularised this belief in great detail in the LBA, **GETZ 3** (at Paragraph 10) provides that, while it considers that the Defendant is "*likely to be processing special category data*" the Claimant reserves its right to amend the Particulars of Claim to this effect in due course. Paragraph 32 of the Particulars of Claim confirms that this potential future amendment is predicated on the Claimant obtaining "*from the Defendant further information which confirms that the Defendant has processed or is processing any Data Subject's special category unlawfully*". The Claimant therefore has no evidence to support its claim that the Defendant is "*likely*" to be processing special category data.
- 5.4.3 At paragraph 26 of **MCCANN 1**, Mr McCann alleges that the Claim has been issued because of the Defendant's alleged initial non-compliance with its obligation to reply to the Cease and Desist Notices and because "*the Defendant did not engage cooperatively to address Good Law Project's concerns prior to the issue of proceedings*". However, the only basis for the Claimant's purported concerns is that it infers that the Defendant had not searched for any personal data of the Data Subjects. The Claimant has, once again, supplied no evidence to support this inference.
- 5.5 The Statements also fail to evidence the damage purportedly suffered by any of the 51 Data Subjects represented by the Claimant. Paragraph 33 of the Particulars of Claim outlines that the worry, concern, uncertainty and distress of the 51 Data Subjects is due to the "*delay and deficient nature of, the DSAR Responses and the Defendants confirmation as to whether it processes high sensitive special category data*". The Statements do not provide any documentation to corroborate the damage supposedly suffered by the 51 Data Subjects, still less that it is more than "*de minimis*."

5.6 The Claimant, having been presented with the deficiencies inherent in the Claim, was granted an opportunity to oppose the Defendant's argument that the Claim does not enjoy reasonable prospects of success. The Claimant's failure to do so, despite preparing three separate witness statements in response, solidifies the Defendant's belief that the Claim is entirely speculative, appears to be a test case for the Claimant's campaigning strategies, and is politically motivated.

6. Standing and Representative Capacity

6.1 I have already touched on this in section 3 of this witness statement, but in order that the Claimant understands the position of the Defendant and the basis for that position, I will elaborate.

6.2 The Claimant contends that it satisfies the requirements of section 187(3)(a) of the Data Protection Act 2018 and Article 80 UK GDPR as it is a "*representative body*". The Defendant disputes this, for the reasons set out below.

6.3 The Political Parties Campaign required the Data Subjects to randomly submit Cease and Desist Notices to one or more of five pre-selected political parties. The 51 Data Subjects were purportedly unaware whether the Defendant (and/or any other political party involved in the campaign) actually held any data (paragraph 21 of **MCCANN 1**) and the Defendant has confirmed that it did not. It cannot be said, therefore, that the Data Subjects considered at any point that the Defendant was processing personal data relating to him or her such that it infringed his or her rights. The rights conferred upon the 51 Data Subjects (and the Claimant as a representative body) pursuant to Articles 77, 78, 79 and 80 and the entitlement to compensation under Article 82 naturally fall away.

6.4 The Claimant's constitution, as set out in the evidence of Mr Getz and Mr Maugham, do not demonstrate that it is a non-profit body with statutory objectives directly related to the protection of data subjects' rights and interests.

- 6.4.1 Mr Maugham, at paragraph 11 of **MAUGHAM 1**, explains that, upon incorporating the Claimant, he chose not to be regulated by the Charity Commission as it had become “*politicised*”.
- 6.4.2 He also chose not to constitute the Claimant as a Community Interest Company as he believed it would have fallen foul of the test outlined in Regulation 3 of the Community Interest Company Regulations 2005 (listing the activities that “*are to be treated as not being activities which a reasonable person might consider are activities carried on for the benefit of the community*”). Despite this admission, the Claimant’s website states that its “*assets and funding are used for the benefit of the community*” [page 39 of **KLP1**].
- 6.4.3 The Claimant was incorporated as a company limited by guarantee. As such, the Claimant has no regulatory oversight (such as by the Charity Commission or the Office of the Regulator of Community Interest Companies) and has no obligations of transparency (save from the limited filing requirements of Companies House). Even here, I note that the Claimant (as it is entitled to do, but need not do) has chosen to exempt itself from audit under s 477 of the Companies Act 2006 and that the members have not required the company to obtain an audit of its financial statements.
- 6.4.4 Rather than providing documentary evidence to corroborate Mr Maugham’s assertion that he receives no direct or indirect benefit as the person of significant control of the Claimant, Mr Maugham merely repeats the pledge made on the Claimant’s website to the effect that “*I therefore pledged publicly that Good Law Project would never pay me more than a backbench member of parliament receives (and never has)*” [**MAUGHAM 1**, paragraph 12]. He does not confirm what monies he receives and he does not confirm (nor does he deny) if he receives any indirect benefits (such as interest on loans, rent for premises, etc) from the Claimant.

6.5 The Claimant provides examples in the Statements of its ongoing projects in an attempt to support its claim that it is active in the field of data protection. Paragraph 18 of **MCCANN 1** goes as far as to assert that “*I consider that Good Law Project has been active in the field of data protection and privacy for quite some time*” (my emphasis). However, it appears from the evidence that the first substantive piece of work in data protection the Claimant was involved in was the Political Parties Campaign that targeted the Defendant.

6.5.1 According to the Statements, prior to pursuing the Defendant, the Claimant’s involvement in data protection was minimal and had no substantial impact on data subjects or their rights. The Statements confirm that, prior to the Political Parties Campaign, the Claimant merely co-hosted a round table meeting in 2019 [**MAUGHAM 1**, paragraph 33]; made a public statement on Twitter in 2019 [**MAUGHAM 1**, paragraph 34]; appointed new directors [**MAUGHAM 1**, paragraph 35]; collected academic and legal advice on data protection; and collected evidence in respect of children using Instagram [**MCCANN 1**, paragraph 41].

6.5.2 Exhibited to the Statements is limited evidence of the activities referred to above, i.e., an email dated 10 September 2019; the post from 9 November 2019 on X (formerly Twitter); a snapshot of the “*about*” page of a website “*Instaharms*”; and an article dated June 2025 (i.e. after the commencement of these proceedings). This documentation is hardly sufficient to support the Claimant’s contention that it has been “*active in the field of data protection and privacy for quite some time*” as claimed by Mr McCann in **MCCANN 1** at paragraph 18.

6.5.3 By the Claimant’s own admission, it therefore had no track record of prior litigation or even non-litigation activity in this field prior to the commencement of the Claim against the Defendant.

7. Abuse of Process

7.1 The Defendant maintains that the Claim is an abuse of process, as it is brought for a collateral purpose and/or is vexatious.

7.2 Due to the Claimant's lack of documentary evidence, I am not privy to the specific details of the Political Parties Campaign. However, from the information provided in **MCCANN 1** (at paragraphs 19 – 26), it appears that, if the Claimant was truly concerned with the way in which political parties targeted voters in the *run-up* to an election (as it claimed to be at **MCCANN 1**, paragraph 19), the most logical course of action would be to submit the Cease and Desist Notices upon conclusion of that electoral process. This would ensure that the data collected (if any such data were collected) would evidence the strategies and tactics employed in the months leading up to that political event. It seems inefficient for the Claimant to target the Defendant (and supposedly four other political parties) and “*assist*” 20,000 individuals to request this data a month prior the general election.

7.3 In any event, the Claimant was aware, prior to issuing the Claim, that the Defendant had replied to the 1,746 Cease and Desist Notices. Despite this, it issued the Claim founded on Particulars of Claim which are imbued with conjecture and assumptions. Upon being faced with the Defendant's argument that the Claim has no prospects of success, the Claimant filed the Statements, all of which do nothing to formally evidence its claim.

8. Costs

8.1 The Defendant seeks its costs of the Application, to be summarily assessed if not agreed.

9. Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be

made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed

Keeley Parry

Associate of Griffin Law

For and on behalf of Reform UK Party Limited

Dated: 23 October 2025

This statement is served on the Claimant's solicitors: Pallas Partners LLP, 22nd Floor, 110 Bishopsgate, London, EC2N 4AY (and by email: [REDACTED])

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B E T W E E N:

The Good Law Project Ltd

Claimant

-and-

Reform UK Party Limited

Defendant

**WITNESS STATEMENT OF KEELEY
LOUISE PARRY**

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Defendant/Applicant

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