Email

FW: Information request consultatio...

Regarding	IC-2... Worked By	Joa... Status Reason	Received
	Activity Marker	Existing C... Direction	Incoming

Email

From	Joanne.Wright@ico.org.uk
To	ICO Casework
Cc	
Subject	FW: Information request consultation - NPCC IC-257261-H7W4
Display Name	Internal consult - nothing held
Date Received	25/09/2023 09:00
Email Address	Joanne Wright Joanne.Wright@ico.org.uk

From: [redacted]**@ico.org.uk>**
Sent: Monday, September 25, 2023 8:53 AM
To: [redacted]**@ico.org.uk>;** [redacted]**@ico.org.uk>; Joanne Wright <Joanne.Wright@ico.org.uk>**
Subject: RE: Information request consultation - NPCC IC-257261-H7W4

Hi All,

I don't recall any conversations or discussions with the NPCC on this topic – in passing it seems like an odd thing for them to approach us about in any event, and I'm not sure why a 'collision' would give rise to any particular issues that would require our input. In any event, as [redacted] **says, anything material I had would be on sharepoint or Meridio, so if it's not there, there probably isn't anything held.**

Just to confirm, I've checked my local files and have nothing there either.

Thanks

[redacted]

[redacted]

Senior Policy Officer

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
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From: [redacted]@ico.org.uk>
Sent: Thursday, September 21, 2023 10:57 AM
To: [redacted]@ico.org.uk>; **Joanne Wright <**Joanne.Wright@ico.org.uk**>**
Cc: [redacted]@ico.org.uk>
Subject: RE: Information request consultation - NPCC IC-257261-H7W4

Hi Joanne,

Just to add to this I did reach out to those who used to manage this relationship re RMS who have reviewed their records and checked Meridio and can't find any info related to this type of engagement.

We'll await [redacted]'s confirmation on his engagement but it doesn't seem likely at this point that any records are held.

Kind Regards,

[redacted]

From: [redacted]@ico.org.uk>
Sent: Thursday, September 21, 2023 10:47 AM
To: Joanne Wright <Joanne.Wright@ico.org.uk>
Cc: [redacted]@ico.org.uk>; [redacted]@ico.org.uk>
Subject: RE: Information request consultation - NPCC IC-257261-H7W4

Hi Joanne,

I have taken a look and cant find any information relating to this on sharepoint. I would also highly doubt [redacted] has any such information saved in his documents not on sharepoint that relate to this.

Many thanks,
[redacted]

Logo

[redacted]
Lead Policy Engagement Officer – Relationship Management Service (Public Affairs)
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From: [redacted]@ico.org.uk>
Sent: Tuesday, September 19, 2023 2:47 PM
To: Joanne Wright <Joanne.Wright@ico.org.uk>; [redacted]@ico.org.uk>
Cc: [redacted]@ico.org.uk>
Subject: RE: Information request consultation - NPCC IC-257261-H7W4

Hi Joanne

Thanks for getting in touch and you've come to the right place. Can I check the following?

Have they provided much context for what they mean by the term 'collision'?
What they provided a timeframe for when they're looking for information.

[redacted] **he is the main contact for the NPCC. In the meantime [redacted] and I can see whether we have any info pertaining to this. When is the deadline for submission? It's just that it would be useful to [redacted] to review his records but the current deadline doesn't provide him with much of an opportunity.**

I am reasonably confident to say that I don't believe we have ever engaged with the NPCC on this matter but it may be that we have engaged on this topic pre the formation of our team (pre 2019), hence my Q on the timeframe.

Kind Regards,

[redacted]

From: Joanne Wright <Joanne.Wright@ico.org.uk>
Sent: Tuesday, September 19, 2023 2:40 PM
To: [redacted]@ico.org.uk>; [redacted]@ico.org.uk>
Subject: Information request consultation - NPCC IC-257261-H7W4

Hi,

We have received the following information request:

"Copies of any correspondence exchanged with the NPCC about the sharing of data when a collision has taken place."

Please can you let me know if you are aware of any information which would fall within the scope of this request?

Iris lists the two of you as the main stakeholder contacts for the NPCC but if there are other areas of the business that you think may hold information relevant to this request please let me know. I will check the case work system for relevant complaints.

Due to the statutory timescales for a response I would be grateful if you could get back to me by the end of Tuesday 26 September. Please let me know if you need any further information or if it would be helpful to have a call about the request. My working days are Monday-Wednesday.

Many thanks

Joanne

Logo

Joanne Wright
Senior Information Access Officer, Risk and Governance Department

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File Name	Followed	File Size (Byte...
image001.jpg	No	3,063

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Case Reference Number IC-257261-H7W4

25 September 2023

FILE NOTE:

Undertook searches on ICE360 – nothing of relevance

Searched CMEH legacy – no relevant cases and no correspondence in scope

Internal consults with RMS (see activities) they confirmed no information held.

Case Reference Number IC-257261-H7W4

25 September 2023

Case Reference Number IC-257261-H7W4

25 September 2023

Email

FW: Follow up on FOI request- NPCC...

Regarding | IC-2... Worked By | Han... Status Reason | Received

Activity Marker | Existing C... Direction | Incoming

Email

From	Hannah.Silk@ico.org.uk
To	ICO Casework
Cc	
Subject	FW: Follow up on FOI request- NPCC IC-257261-H7W4
Display Name	Additional consult for IR
Date Received	19/10/2023 14:53
Email Address	Hannah Silk Hannah.Silk@ico.org.uk

From: Hannah Silk
Sent: Monday, October 16, 2023 11:14 AM
To: [redacted]@ico.org.uk>; [redacted]@ico.org.uk>; [redacted]@ico.org.uk>
Subject: RE: Follow up on FOI request- NPCC IC-257261-H7W4

Hi [redacted]

Yes this is helpful thank you, agree the quoted advice is hard to track down without context and could have been more general or acquired in a number of ways. I think the response will remain that we haven't been able to locate this as part of reasonable searches and suggest further context is given if the requester still believes we hold this.

Thanks

Hannah

Logo

Hannah Silk
Senior Information Access Officer
Corporate Planning, Risk and Governance Directorate
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From: [redacted]@ico.org.uk>
Sent: Monday, October 16, 2023 9:39 AM
To: Hannah Silk <Hannah.Silk@ico.org.uk>; [redacted]@ico.org.uk>; [redacted]@ico.org.uk>
Subject: RE: Follow up on FOI request- NPCC IC-257261-H7W4

Hi, [redacted], so I don't know if this has been dealt with elsewhere.

I can't recall giving any advice about exchange of information in road traffic collision scenarios, but the advice quoted there is pretty generic and would apply in any situation where the police was

operating outside of Part 3 of the DPA, ie not in a 'law enforcement' role (as defined in part 3 of the DPA 2018). So it is possible that this is taken from advice we have give in that wider context, and not specifically in the context of s170 of the Road Traffic Act. I've not found any meeting notes that indicates we gave this advice and it may have just been a verbal comment, for example, in a catchup meeting with the NPCC and not captured in the meeting note. It's also not clear when this advice was given, and there's no reason to assume this was recent guidance at the time of the NPCC comms to Chief Constables. So on that basis, it's difficult to locate anything relevant. I've had a quick look on Sharepoint, and haven't seen any meeting note with the NPCC which appears to meet this description.

We have done some work with NPCC around data-sharing, but I don't recall anything around road traffic work. The stuff we've done more recently has mostly been about mythbusting, and encouraging responsible data sharing. To the extent that we have talked about Part 3 to Part 2 sharing (which is the context of this FOI) I'm not aware of anything that relates specifically to the Road Traffic Act, or any scenarios about exchange of data after a collision. There's some published guidance around data sharing for non law-enforcement purposes here: Data sharing and reuse of data by competent authorities for non-law enforcement purposes | ICO

Not sure if [redacted] or [redacted] has anything else.

Hope this helps, a bit.

Thanks

[redacted]

[redacted]

Senior Policy Officer – Public Affairs | Sectors

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From: Hannah Silk <Hannah.Silk@ico.org.uk>
Sent: Monday, October 9, 2023 12:06 PM
To: [redacted]@ico.org.uk>; [redacted]@ico.org.uk>; [redacted]@ico.org.uk>
Subject: Follow up on FOI request- NPCC IC-257261-H7W4

Hi all

You will recall that my colleague Joanne Wright contacted you in September about an FOI request we'd received asking for the following information:

"Copies of any correspondence exchanged with the NPCC about the sharing of data when a collision has taken place."

I have seen the email chain where she consulted you with you and advised that nothing was held, and we responded accordingly. We subsequenty recieved a request for internal review from the requester, which I am now handling, which included further information in support of their belief that we do hold this information:

"the NPCC have disclosed that 30/05/2023 they wrote to all Chief Constables:

'The Information Commissioners Office have subsequently advised that data cannot be shared this way under Part 3 Data Protection Act 2018, because it is not shared for law enforcement purposes, it is shared to support civil claims or proceedings.'

the subject relates to Police Disclosure of Information in relation to Section 170 Road Traffic Act 1988"

Given that the original request was a little unclear, I just wanted to check whether you hold anything in the light of this further information? It also occurs to me that NPCC did not specifically say that we gave this advice directly to them, and it may be a quote from general

advice we have published, which would also explain why we wouldn't have found it based on the searches we undertook.

Our deadline for responding to the review is 24 October.

Many thanks

Hannah

Logo

Hannah Silk
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image001.jpg	No	3,063

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