

Craig Ineson

From: Caroline.Mooney
Sent: 02 May 2023 17:40
To: [REDACTED]
Cc: Kenneth.Macdonald
Subject: RE: Security vetting information

That would be perfect. Looking forward to meeting you then

Many thanks

Caroline



Caroline Mooney
Regional Manager (Northern Ireland)

Information Commissioner's Office, 3rd Floor,
14 Cromac Place, Belfast BT7 2JB

T. 0330 414 6431 (directline). T. Local helpline 0303 123 1114
ico.org.uk twitter.com/iconews

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From: [REDACTED]@policeombudsman.org>
Sent: 02 May 2023 17:35
To: Caroline.Mooney <Caroline.Mooney@ico.org.uk>
Cc: Kenneth.Macdonald <Kenneth.Macdonald@ico.org.uk>
Subject: RE: Security vetting information

External: This email originated outside the ICO.
Caroline

We're happy to go to your office. Say 2pm?

Kind Regards,

[REDACTED]

From: Caroline.Mooney [<mailto:Caroline.Mooney@ico.org.uk>]
Sent: 02 May 2023 17:23
To: [REDACTED]@policeombudsman.org>

Cc: Kenneth.Macdonald <Kenneth.Macdonald@ico.org.uk>
Subject: RE: Security vetting information

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Yes afternoon is fine. Anytime in the afternoon is fine with us- I will hold it all over until you confirm. We can go over to yourself or you can come to us. Let me know what suits.

Many thanks

Caroline



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From: [REDACTED] <[\[REDACTED\]@policeombudsman.org](mailto:[REDACTED]@policeombudsman.org)>

Sent: 02 May 2023 14:32

To: Caroline.Mooney <Caroline.Mooney@ico.org.uk>

Subject: RE: Security vetting information

External: This email originated outside the ICO.
Caroline

FOIA s.44 - Prohibition on disclosure

Would it be possible to meet you and Ken that afternoon?

Kind Regards,

[REDACTED]

From: Caroline.Mooney [<mailto:Caroline.Mooney@ico.org.uk>]

Sent: 02 May 2023 09:43

To: FOIA s.40(2) - Personal data that doesn't fall under s.40(1) [@policeombudsman.org](mailto:>@policeombudsman.org)>

Subject: RE: Security vetting information

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FOIA s.40(2) - Personal data that doesn't fall under s.40(1)

Many thanks for contacting.

In terms of your specific query, FOIA s.44 - Prohibition on disclosure
[REDACTED]

With the Bank holiday yesterday, my diary is back to back until Thursday of this week. I will be in Belfast on Thursday and have good availability most of the day from 1030 onwards if this suits to meet. In addition to this our Head of ICO regions, whom you may know, Ken Macdonald will also be in the office and could attend a potential meeting if required.

Let me know if Thursday suits and we can get something into the diary.

Many thanks

Caroline



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Mr John McGinnity
Interim Director of Corporate Services
Police Ombudsman NI

[By Email Only]

14/08/2023

Dear John,

Retention of Vetting Records in the Police Ombudsman's Office

Many thanks for your letter of 3 August regarding the above and I hope you are settling down in your new role. Please accept my apologies for the short delay in responding but, as you will appreciate, I have been heavily engaged with matters relating to the PSNI breach.

I am pleased to note that, following our previous advice, FOIA s.44 - Prohibition on disclosure

[Redacted]

FOIA s.44 - Prohibition on disclosure
[Redacted]

Neither the Data Protection Act 2018 nor the UK GDPR make provision for a formal internal review of a SAR akin to that required under freedom of information legislation. However, where an organisation provides that a review may be undertaken, it would be good practice for the reviewer to be someone unconnected with the original decision.

Please note that we expect individuals raising concerns with us to exhaust the complaints procedure of the relevant organisation prior to submitting

their case to us. If they have not done so, we will direct them back to that organisation. As such, there would be no benefit to immediately directing a dissatisfied requestor to the ICO.

I hope that the above is of help. However, if you wish, I would be pleased to meet with you to discuss your SAR process further and see if we can identify ways to assist.

I look forward to hearing from you.

Best wishes

FOIA s.40(2) - Personal data that doesn't fall under s.40(1)

A large black rectangular redaction box covers the signature area of the letter.

Ken Macdonald
Head of ICO Regions
Information Commissioner's Office

Craig Ineson

From: [redacted]@policeombudsman.org>
Sent: 24 August 2023 12:14
To: Caroline Mooney
Subject: RE: Vetting records - FOI requests and [redacted]
Attachments: [redacted]

External: This email originated outside the ICO.
Hi Caroline

[redacted]

I'll keep you updated if there is anything further and relevant to you, and will revert on the FOI issue at a later point when things may be slightly less hectic (?).

Thanks again.

Regards

[redacted]

[redacted]



From: Caroline Mooney [mailto:Caroline.Mooney@ico.org.uk]
Sent: 23 August 2023 11:59
To: [redacted]@policeombudsman.org>
Subject: RE: Vetting records - FOI requests and [redacted]

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[redacted]

Im literally just of morning meetings and available now until around 1pm if you want to call me on my directline?

Many thanks

Caroline



Caroline Mooney
Regional Manager (Northern Ireland)

Information Commissioner's Office, 3rd Floor,
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From: FOIA s.40(2) - Personal data that doesn't fall under s.40(1) @policeombudsman.org
Sent: Wednesday, August 23, 2023 9:59 AM
To: Caroline Mooney <Caroline.Mooney@ico.org.uk>
Subject: Vetting records - FOI requests and FOIA s.44 - Prohibition on disclosure
Importance: High

External: This email originated outside the ICO.
Hello Caroline

The Police Ombudsman, Marie Anderson, has passed your contact details to me to allow me to raise an FOI issue FOIA s.44 - Prohibition on disclosure

[Redacted]

- An FOI request asks for 'copies of all emails and letters exchanged between the PONI office and the Information Commissioner's office for the year 2023 relating to developed vetting'.

Would it be possible to have a conversation if you are available to speak today? There is no urgency with regard to the FOI response. FOIA s.44 - Prohibition on disclosure

Thanks and regards

FOIA s.40(2) - Personal data that doesn't fall under s.40(1)

[Redacted]

Craig Ineson

From: [redacted]@policeombudsman.org>
Sent: 12 September 2023 11:29
To: Caroline Mooney
Subject: RE: Vetting records - FOI requests

External: This email originated outside the ICO.
Hi Caroline

Thanks for your advice on this.

FOIA s.44 - Prohibition on disclosure

I appreciate your time and help with this over the last number of weeks.

Best regards

[redacted]

[redacted]



From: Caroline Mooney [mailto:Caroline.Mooney@ico.org.uk]
Sent: 08 September 2023 09:39
To: [redacted]@policeombudsman.org>
Subject: RE: Vetting records - FOI requests

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Apologies for the delay in response.

As an independent regulator we cannot provide specific views on an organisation's decision to disclose information or on the application of a particular exemption, regardless of whether we are party to that correspondence. We do however have extensive guidance on exemptions which can be found [here](#).

However, if you wish to consult with us as a third party when considering disclosure, we would be happy to look at the held material that is in scope of the request and provide you with any comments or concerns we may have on disclosure. Our info

access team have advised that this would be the normal consultation process for ourselves and within that we would consult with all other internal ICO depts (relevant to the scope of the request) and seek their views on disclosure also . It would ultimately then be for yourselves to take the final decision on release following any consultation you may undertake with us as a third party.

Many thanks

Caroline



Caroline Mooney
Regional Manager (Northern Ireland)

Information Commissioner's Office, 3rd Floor,
14 Cromac Place, Belfast BT7 2JB

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From: FOIA s.40(2) - Personal data that doesn't fall under s.40(1) [@policeombudsman.org](https://twitter.com/policeombudsman)
Sent: Monday, September 4, 2023 8:31 AM
To: Caroline Mooney <Caroline.Mooney@ico.org.uk>
Subject: RE: Vetting records - FOI requests

External: This email originated outside the ICO.

Thanks Caroline.

I'll wait to hear.

Regards

FOIA s.40(2) - Personal data that doesn't fall under s.40(1)



From: Caroline Mooney [<mailto:Caroline.Mooney@ico.org.uk>]
Sent: 01 September 2023 16:29

To: **FOIA s.40(2) - Personal data that doesn't fall under s.40(1)** @policeombudsman.org>
Subject: RE: Vetting records - FOI requests

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FOIA s.40(2) - Personal data that doesn't fall under s.40(1)

Thanks for your email. I've reached out to one of my colleagues in our info access team who would normally advise on this issue internally and deal with requests we also receive as an org. I will come back to you as soon as I hear from them (which will be next week)

Many thanks

Caroline



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From: **FOIA s.40(2) - Personal data that doesn't fall under s.40(1)** @policeombudsman.org>
Sent: Friday, September 1, 2023 3:00 PM
To: Caroline Mooney <Caroline.Mooney@ico.org.uk>
Subject: RE: Vetting records - FOI requests

External: This email originated outside the ICO.
Hi again Caroline

FOIA s.44 - Prohibition on disclosure

I had mentioned that we have received an FOI request in relation to the same issue.

The requester asks: Please provide copies of all emails and letters exchanged between the PONI office and the Information Commissioner's office for the year 2023 relating to developed vetting.

The internal view here is that s41 may apply to this correspondence given that section 132 of the DPA 2018 applies in terms of confidentiality of the information obtained by the ICO in terms of its regulatory function.

I would appreciate your view, while also appreciating that it is ultimately our decision whether to release or not.

If it's easier to chat it through, please don't hesitate to give me a call.

Thanks and regards

FOIA s.40(2) - Personal data that doesn't fall under s.40(1)

[Redacted signature block]



From: FOIA s.40(2) - Personal data that doesn't fall under s.40(1)

Sent: 24 August 2023 12:14

To: 'Caroline Mooney' <Caroline.Mooney@ico.org.uk>

Subject: RE: Vetting records - FOI requests and FOIA s.44 - Prohibition on disclosure

Hi Caroline

FOIA s.44 - Prohibition on disclosure

[Redacted line]

I'll keep you updated if there is anything further and relevant to you, and will revert on the FOI issue at a later point when things may be slightly less hectic (?).

Thanks again.

Regards

FOIA s.40(2) - Personal data that doesn't fall under s.40(1)

[Redacted signature block]

From: Caroline Mooney [<mailto:Caroline.Mooney@ico.org.uk>]

Sent: 23 August 2023 11:59

To: FOIA s.40(2) - Personal data that doesn't fall under s.40(1) [@policeombudsman.org](mailto:policeombudsman.org)>

Subject: RE: Vetting records - FOI requests and FOIA s.44 - Prohibition on disclosure

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Im literally just of morning meetings and available now until around 1pm if you want to call me on my directline?

Many thanks

Caroline



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Email

FW: PONI Letter to ICO re...

Regarding

Worked By

Status Reason

R...



Activity Marker



E... Direction



L...



Email

From

FOIA s.40(2) - Personal data that doesn't fall under s.40(1)

To

ICO Casework

Cc

Subject

FW: PONI Letter to ICO re Vetting Records IC-252393-M4Q7

Display Name

Date Received

21/08/2023 09:47

Email Address

FOIA s.40(2) - Personal data that doesn't fall under s.40(1)@ico.org.uk

From: NI External Email Account

Sent: Monday, August 14, 2023 4:31 PM

To: McGinnity, John (OPONI) <john.mcginny@policeombudsman.org>

Subject: RE: PONI Letter to ICO re Vetting Records

Hi John,

Please find the attached response from Ken.

Kind regards,

FOIA s.40(2) - Personal data that doesn't fall under s.40(1)

FOIA s.40(2) - Personal data that doesn't fall under s.40(1)

Support Officer (Northern Ireland)

**Information Commissioner's Office, 3rd Floor,
14 Cromac Place, Ormeau Road, Belfast BT7 2JB**

FOIA s.40(2) - Personal data that doesn't fall under s.40(1)

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From: McGinnity, John (OPONI) <john.mcginnity@policeombudsman.org>
Sent: Thursday, August 3, 2023 4:06 PM
To: NI External Email Account <NI.ExternalEmailAccount@ico.org.uk>
Subject: PONI Letter to ICO re Vetting Records

External: This email originated outside the ICO.
Please see attached, [FAO Ken Mcdonald](#)

Regards


John McGinnity
Interim Director of Corporate Services
Police Ombudsman for Northern Ireland

New Cathedral Buildings | Writer's Square | 11 Church Street | Belfast | BT1 1PG

Tel: FOIA s.40(2) - Personal data that doesn't fall under s.40(1)
E-mail: john.mcginnity@policeombudsman.org

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ATTACHMENTS

<u>File Name</u>	<u>Followed</u>	<u>File Size (Byte...)</u>	
20230814 ICO - PONI response .pdf	No	108,159	

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