

08 December 2023

ICO Case Reference IC-269599-S0F3

Request for information

Request received 11 November 2023:

"Centrica PLC states that it has discussed and consulted with ICO about its identity verification approach. It requires formal identity documents when there is already an established relationship with the applicant - eg when Centrica has already, and recently, provided personal data to the same person at the same address. ICO has apparently stated that it is satisfied with this approach even when it is contrary to its detailed guidance. Please provide all recorded information that ICO holds relating to these discussions and consultations and its approval of Centrica's approach."

Your request has been handled under the Freedom of Information Act 2000 (the FOIA). This legislation provides public access to recorded information held by a public authority unless an appropriate exemption applies.

Our response

We do hold information in scope of your request. However, conducting searches for all of the information in scope would exceed the cost limit set out by section 12 of the Freedom of Information Act 2000 (FOIA).

[The Freedom of Information and Data Protection \(Appropriate Limit and Fees\) Regulations 2004 \(legislation.gov.uk\)](#) states that the 'appropriate limit' for the ICO is £450. We have determined that £450 would equate to 18 hours work.

Exchanges between the ICO and Centrica regarding their approach to ID verification could exist on any data protection complaint case file and/ or self-reported personal data breach (PDB) report that relates to Centrica, or to the other businesses to which Centrica is a parent company, such as British Gas.

Our case management system is not able to run a quick automated report on this type of information because it is not needed for our business purposes to record in a distinct database field if a complaint or PDB report relates to ID verification. Therefore, to locate all the information you have requested would require a manual search of over 900 cases. This would include reading the nature of the complaint or PDB report, and reading all incoming and outgoing correspondence with the data controller to check for any discussion of ID verification.

Assuming that each search would take approximately 2 minutes to complete – and it is certain that some searches would take longer – this would equate to over 30 hours' worth of searching. This clearly exceeds the 18 hours which would accrue a charge of £450 or more, triggering the provisions of section 12 of the FOIA.

Advice and assistance

If you wish for us to consider your request to include information held in our casework management system without prompting a section 12 refusal, you could consider narrowing the scope of your request. For example, you could ask us to search complaint cases and PDB reports within a specific timeframe, or to only search complaints recorded against Centrica accounts in our casework management system.

Please be aware that we would need to consider if it is in the public interest for us to dedicate the resources necessary to carry out this kind of manual search, or whether it represents an unreasonable burden on us as a public authority.

Searches of other records outside of our casework management system have been possible within the appropriate limit. If we consider your request as currently worded but excluding data protection complaint cases and PDB reports from the scope of the request, then we can confirm that we hold information in scope of your request, and attach the information to which you are entitled. This is all the information we found during our searches for information held in areas other than our casework management system.

Some information has been redacted because it is third party data. Further explanation of this is provided below.

FOIA section 40(2)

Section 40(2) of the FOIA exempts information if it is personal data belonging to an individual other than the requester and it satisfies one of the conditions listed in the legislation.

We find that the condition at section 40(3A)(a) applies in this instance: that disclosure would breach one of the data protection principles. The principles are outlined in the UK General Data Protection Regulation (UK GDPR) with the relevant principle on this occasion being the first principle as provided by Article 5(1): that personal data shall be processed lawfully, fairly and in a transparent manner.

We do not consider that disclosing this information into the public domain is necessary or justified. There is no strong legitimate interest that would override the prejudice to the rights and freedoms of the relevant data subjects. We have therefore taken the decision that disclosing this information would be unlawful, triggering the exemption at section 40(2) of the FOIA.

This concludes our response to your request.

FOI review procedure

If you are dissatisfied and wish to request a review of our decision or make a complaint about how your request has been handled you should write to the Information Access Team at accessicoinformation@ico.org.uk, or the postal address below.

Your request for internal review should be submitted to us within 40 working days of your receipt of this response. Any such request received after this time will be considered only at the discretion of the Commissioner.

If having exhausted the review process you are not content that your request or review has been dealt with correctly you have a further right of appeal to

this office in our capacity as the statutory complaint handler under the legislation.

To make such an application, please write to our FOI Complaints and Compliance team at the address given, or visit our website at [Official information concern | ICO](#).

Your information

Our [Privacy Notice](#) explains what we do with the personal data you provide to us and what your rights are. This notice includes entries regarding the specific purpose and legal basis for the ICO processing information that people such as [information requesters](#) have provided to us.

The length of time we keep information is laid out in our [retention and disposal policy](#).

Yours sincerely

Information Access Team

Strategic Planning and Transformation

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

T. 0303 123 1113 ico.org.uk twitter.com/iconews

For information about what we do with personal data see our [privacy notice](#)