

15 December 2023

IC-271692-C0T3

Request

You asked us:

Dear Information Commissioner's Office,

"On page 135 of the 'Independent external review of Lancashire Constabulary's operational response to reported missing person Nicola Bulley' it states:

'The ICO advised the College that, during a time-critical incident (where it may not be known if it is a criminal matter), forces should consider the threat and risk factors, and use that to assess the necessity and proportionality of any use or disclosure of personal information. Early inclusion of a data protection professional will be key to ensuring that the right people are part of that urgent decision-making process. The decision should be documented with a clear rationale and retained for later scrutiny. These elements were considered by Lancashire Constabulary and their legal team.'

<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.college.police.uk%2Farticle%2Freview-nicola-bulley-investigation-published&data=05%7C01%7Cicoaccessinformation%40ico.org.uk%7C82f8c3ebe19f46fa4e2508dbea89e4b0%7C501293238fab4000adc1c4cfefba21e6%7C0%7C0%7C638361650216739913%7CUnknown%7CTWFpbGZsb3d8eyJWIjojMC4wLjA wMDAiLCJQIjojV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=%2B8uxm6iBcw4sNF2cTek4caf8LyL1lbZCYEjPw0uqCqE%3D&reserved=0>

Please provide full details of the advice you provided."

We received your request on 21 November 2023.

We have handled your request under the Freedom of Information Act 2000 (the FOIA).

Our response

I can confirm that we hold information in scope of your request.

The advice in question was provided over the course of a meeting held between the ICO and the College of Policing on 28 July 2023. The content of the meeting was recorded through notes taken by ICO staff.

Please find attached the notes regarding this meeting. The attached comprises all information we hold in scope of your request, and no information has been withheld from our response.

This concludes our response to your request.

Next steps

You can ask us to review our response. Please let us know in writing if you want us to carry out a review. Please do so within 40 working days.

You can read a copy of our full review procedure [here](#).

If we perform a review but you are still dissatisfied, you can complain to the ICO as regulator of the FOIA. This complaint will be handled just like a complaint made to the ICO about any other public authority.

You can [raise a complaint through our website](#).

Your information

Our [privacy notice](#) explains what we do with the personal data you provide to us, and sets out [your rights](#). Our [Retention and Disposal Policy](#) details how long we keep information.

Yours sincerely



Information Access Team
Strategic Planning and Transformation
Information Commissioner's Office, Wycliffe House, Water
Lane, Wilmslow, Cheshire SK9 5AF
ico.org.uk twitter.com/iconews
Please consider the environment before printing this email
**For information about what we do with personal
data see our [privacy notice](#)**