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2 January 2024

IC-277113-Y4G3

Request

On 14 December 2023 you made the following request:

Please provide:

- the name of your case management system
- the annual cost of your case management system
- the name of the manufacturer
- screenshots of any screens (with dummy info) used for training purposes

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

Response

We hold information that falls under the scope of your request. However, to locate all of the information requested from our records would exceed the cost limit set out by ection 12 of the Freedom of Information Act 2000 (FOIA). This is due to your fourth point, which requires us to provide all screenshots with dummy information, that are used for training purposes.

Section 12 of the FOIA makes clear that a public authority is not obliged to comply with an FOIA request if the authority estimates that the cost of complying with the request would exceed the 'appropriate limit'. The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 stipulates that the 'appropriate limit' for the ICO is £450. We have determined that £450 would equate to 18 hours work.

We use a case management system called ICO 360 (which is based on Microsoft Dynamics) to process cases such as advice, complaints, information requests, personal data breaches and data protection fees. Following consultations with the teams that use this system and searches of our online files, over 9000 results



have been found which may contain the information you are looking for. This is because the system has been in use for several years and is used by various teams to fulfil different functions. A range of training materials have been developed over this period by the various teams involved, and we have already published examples (including screenshots) as part of previous request disclosures, for example IC-236327-C7Q7. Therefore if you are only seeking examples of what the system looks like, this may satisfy the fourth point of your request.

It is likely that many of the 9000+ search results we have located so far do not contain dummy data and/or may not be training materials. However, to be sure that we cover everything, we would need to check each item individually as we do not have a way in which to electronically extract this information. Furthermore, many of the screenshots we hold only show small sections of the screen/system, and even if we were able to locate and compile all relevant examples within the cost limit, it is unclear how representative or useful this information would be as a series of standalone screenshots.

On the other hand, if the results did present a comprehensive picture of how our system operates, we would need to consider whether disclosing this in entirety would present a security risk, and whether exemptions may apply, for example see the concerns we raised in response to another request about our case management system.

Assuming it would take 1 minute to search each of the 9000+ search results (and in some cases this would take longer), we estimate that it would take us over 150 hours to isolate any relevant screenshots. The overall work involved falls well in excess of the 18 hours which would accrue a charge of £450 or less, triggering the provisions of section 12 of the FOIA. We are therefore refusing the request on this basis.

Advice and assistance

As mentioned we have previously published details about our case management processes, including screenshots and information about the systems we use (such as system name and supplier), in response to other requests.

For example, points 1 and 3 are addressed by <u>our response to a previous information request</u>, and the information included in this response would, if submitted as a standalone request, be exempt in accordance with Section 21 as it is already accessible to you.



Examples of screenshots provided in previous responses such as <u>this one</u> may provide you with the information you are seeking in relation to point 4, if all you are looking for are some examples.

Similarly you may also find some of the information we've published in response to previous requests useful, for example:

- Procedures and guidance for casework
- Case handling procedures
- <u>Training materials used by Public Advice and Data Protection Complaints</u> Service
- Manual used by the Information Access Team
- Details about system name and supplier
- <u>Information about our case management system which is exempt from disclosure</u>

You can search for other examples on our <u>disclosure loq</u>.

We could consider point 2 as a standalone request, or a refined version of point 4, if you wish to pursue this further. In relation to the fourth point you might consider clarifying this by providing one or more of the following:

- A particular timeframe (e.g. anything authored in 2023)
- Details of the training materials you are interested in (e.g. those used by a specific teams, or information relating to a particular function)
- Screenshots relating to particular functions (e.g. setting up a case, sending emails etc.)

Any request that requires us to manually search a large volume of items to locate information may exceed the cost limit, and we cannot guarantee the accuracy of the results provided following manual searches. Consideration can also be given as to whether the value to the public of the information derived from such searches is proportionate to the effort to locate it, particularly given the issues regarding accuracy described.

As mentioned, we also need to consider the security risk of disclosing details about the systems we use, so depending on what is requested, exemptions may in some cases apply.

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 on our website.

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 <u>raise a complaint</u> through our website.

Your information

Our <u>privacy notice</u> explains what we do with the personal data you provide to us, and sets out <u>your rights</u>. Our <u>Retention and Disposal Policy</u> details how long we keep information.

Yours sincerely,



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