

23 January 2024

## **IC-279611-P3Q4**

### **Request**

We received your letter dated 14 December 2023 on 5 January 2024. You asked a number of questions within this letter, some of which were identified as requiring an answer under the Freedom of Information Act 2000 (the FOIA). This letter is in response to those questions, the rest will be or have been dealt with as appropriate by the relevant departments.

The questions that we have considered under the FOIA are as follows:

*"Question 2 What are ICO aware of NWB taking longer to respond to SAR's?."*

*Question 3 What progress have NWB informed ICG, they are making?*

*Question 4 Have ICO given NWB permission to take longer than a month to supply a SAR to a customer?*

*Question 5 What agreements do ICO have with NWB regarding them failing to comply with the 1 month Law requirement.?"*

### **Our response**

Question 1:

We do hold information within the scope of this part of your request.

In July 2023 NatWest contacted the ICO to request a call about an increase in the volume of SARs that the bank had received following some press coverage at the time. The ICO held a call with NatWest on the 21<sup>st</sup> of July in which NatWest advised that it had received the same number of SARs in two days as it would usually receive in a month following the press coverage and was concerned about its capacity to meet this increased demand.

Subsequently the ICO and NatWest agreed to conduct regular virtual meetings to monitor their progress in managing the uptick in SARs received, this was

facilitated and regular meetings occurred up to 21 November, which was the last meeting that was held prior to the date of your request.

The Bank continued to receive an unusually high volume of SARs during this period, which has resulted in a backlog of overdue requests.

Questions 3:

We do hold information within the scope of this part of your request.

During this period, NatWest has kept the ICO informed of measures it had taken to deal with the higher volume of SARs, including employing more staff and upskilling existing staff.

In the meeting on 21 November NatWest advised that it was then responding to more SARs each day than it was receiving, meaning that it would be on track to clear the backlog in January. It also advised that it would be looking in January to review its operating model for responding to SARs in future which would allow flexibility to deal with future peaks such as the one experienced in the second half of 2023.

The ICO then agreed to decrease the frequency of meetings going forward due to the progress that NatWest had demonstrated.

Question 4:

We hold no information with the scope of this part of your request.

The ICO has not given any such permission and would not do so as part of its regulatory procedures.

Question 5:

We hold no information with the scope of this part of your request.

The ICO has not made any agreements with NatWest about this, the ICO has been working with NatWest to assist them in improving their compliance following the increase in SARs it has received but this has not involved coming to any agreement with them about this.

This concludes our response.

**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 on our website here:

<https://ico.org.uk/media/about-the-ico/policies-and-procedures/4028044/ico-review-procedure.pdf>

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 here:

<https://ico.org.uk/make-a-complaint/foi-and-eir-complaints/foi-and-eir-complaints/>

## **Your information**

Our privacy notice explains what we do with the personal data you provide to us, and sets out your rights:

<https://ico.org.uk/global/privacy-notice/>

Our Retention and Disposal Policy details how long we keep information:

<https://ico.org.uk/media/about-the-ico/policies-and-procedures/4024937/retention-and-disposal-policy.pdf>

Yours sincerely



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