

Restricted case procedure

We will occasionally receive requests that have a level of sensitivity or confidentiality which mean that it would not be appropriate to handle within ICE360.

This may include, for example, requests from ICO employees or individuals of significant public interest. This is not an exhaustive list: it will be a judgement call for the individuals assigning cases as to whether it should be handled as a restricted case.

Cases assigned in this way will be assigned to the Case Officer outside of ICE360, for example by an email marked Official Sensitive. They will then need to follow the process described below.

1. If case not already on ICE360, set up a shell case in ICE360.

Search in the Contacts database for the Contact "Restricted contact - details held off ICE" and select **New Case**.

Use the following case summary format:

Anon ([legislation] - [Description of complaint] (shell case))

So for example:

Anon - DP complaint case – employee SAR (shell case)

Particular care should be given to the description of the case. The purpose of the shell case is only to capture the appropriate MI from the case, such as date of receipt. **Nothing that might help to identify the complainant should be held or written within the shell case.**

If emails or documents are held on the ICE360 case, these will need to be deleted by Operations Service Delivery.

2. Access to Restricted Cases area

Email IThelp to request access to PADPCS' Restricted Cases area and ensure you attach your manager's written authorisation for this.

Provide IThelp with the case reference number to allow them to create the case in the SharePoint EDRM Restricted Cases area.

It is important that the customer is not given the reference number of the shell case. This is to ensure that any correspondence they send to us in relation to it is never automatically redirected to the shell case.

To avoid this, we create a new reference number for use in the EDRM site which can be provided to the requester. Create the code based on the following formula:

RC[initials of Case Officer]-Year-Last four digits of shell case reference

So for example a case being handled by Hannah Jones in 2023 which has a shell case reference ending in ABCD would need to be called:

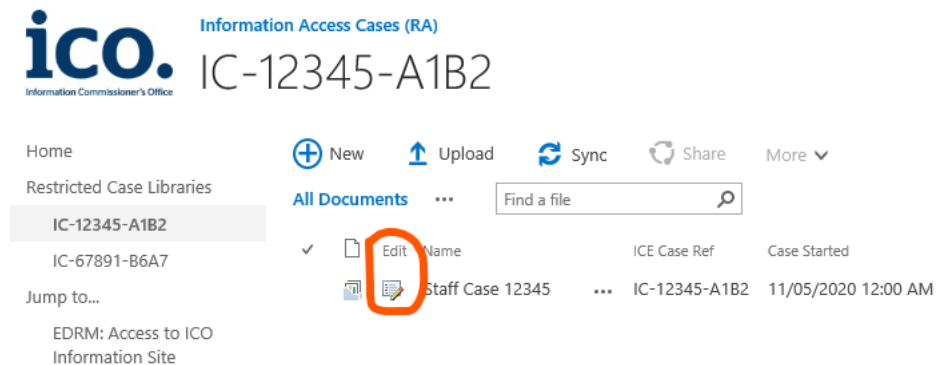
RCHJ-2023-ABCD

IThelp will grant you access to the Restricted Cases area in EDRM.

Please note IThelp will ask you how long you require access to the Restricted Cases area. Please ask for access for one month and extend the timeframe with IThelp if required.

3. Case information

Adjust the properties of the document set to enter the appropriate case information:



As this site is restricted you will be able to store the appropriate case information here such as the name of the customer and specifics relating to the complaint such as date of receipt and completion of case. Care will still need to be provided to whether the amount of information provided is proportionate to our needs.

4. Acknowledgement

The sensitivity of the case may increase the importance of regular contact with the customer. The Case Officer should confirm at the acknowledgement stage that we are handling the case in our restricted case database and that this has an added level of confidentiality, with the reasons for this decision being provided.

The acknowledgement should explain that our correspondence will be sent from the Case Officer's own ICO email address.

5. Case handling and response

All information regarding the case should be held in the EDRM site. Every item of information should be clearly labelled to help prevent against inappropriate disclosure. Case Officers are also encouraged to number documents in date order, such as:

- 1. Official Sensitive – DS to ICO complaint email 26/03*
- 2. Official Sensitive – DS to DC complaint 28/12*
- 3. Official Sensitive – DC to DS response 16/01*

The response and any disclosure should be sent from the Case Officer's ICO email address, before updating the relevant fields in the EDRM file and the shell case.