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23 December 2024

IC-346103-X6B4

Request

On 22 November 2024 you requested:

"1. The date of the earliest FOIA request logged on your current CMS, after which point all subsequent requests have been logged on the same system.

2. A list of all field headings in the CMS, which can be completed as part of the team's work to log, track and respond to individual FOIA requests to the ICO. In other words, when logging and responding to this particular request, what fields are open to you to complete?

3. An extract of the data held in the CMS for all requests received by the ICO in 2023. This extract needs to include all fields except those containing clearly-exempt information (e.g., requestor's name/address, or caseworker name)."

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

We originally responded on 12 December 2024, but have issued this updated version because the original response was missing some information and required additional clarification.

Response

We hold information that falls within scope of your request.

In relation to point 1, please note that we do not hold casework data in our casework management system indefinitely, and that this is not usually retained beyond the retention period detailed in <u>our retention policy</u>. This means that the earliest FOI request retained on our case management system is not necessarily the earliest one to have been logged, but the oldest one we still hold a copy of.



The oldest FOI request case record we hold was logged on 3 April 2020.

In relation to point 2, a list has been provided below. Fields relate to the case setup, any contacts (usually the requester) or accounts (if it relates to a third party organisation) connected to the case, and details that are specific to information request activities.

Case fields	Contact fields	Account fields	IR Activity fields
Case reference	FullName	Name	Created On
created by	Title	AddressLine1	Due Date
			Date Team
created on	FirstName	AddressLine2	Received
date time			
received	LastName	AddressLine3	Subject
function	JobTitle	Postcode	Datasets
			Proactive
legislation	AddressLine1	City	Disclosure
lasthandledby	AddressLine2	County	Request Category
queue	AddressLine3	Country	Previous Case Ref
			Date
			Acknowledgement
sector	AddressLine4	UKRegion	Sent
			Date response
subsector	County	Sector	sent
			Late Response
Outcome	CountryBK	SubSector	Reason
Decision 2	Country	ParentAccountName	Received by ICO
Decision 3	Postcode	MajorAccount	
Closure			
Channel	Mobile	PublicAuthority	
Request			
Channel	Telephone	RegistrationStatus	
Status	Extension	WelshLanguage	
workedby	Email	Fax	
preservation			
reason	Fax	Email	
age category	CreatedBy	CreatedOn	
child	CreatedOn	AccountStatus	
international			
controller		CompaniesHouseNumber	



media interest		
preserved		
text summary		
priority case		
Elected		
Representative		
Correspondence		

Please note that not all of these fields are used by the Information Access Team when handling an FOI request. Our case management system is designed for multiple teams to use for different purposes, so this means that not all fields will be used by all teams, even if they are technically open to all to complete.

In relation to point 3, an extract is attached.

Some of the columns in the previously disclosed data set do not fall within scope of the request, and were included in error. This included details used for reporting purposes only (eg the date fields broken down into week, month, financial year etc.) and fields that are not used by request handlers. These have been removed and we have added in some fields that were missing from the original disclosure, which include details of exemptions applied. As there are sometimes multiple exemptions per request, you will note that some requests span multiple rows.

As requested details about identifiable individuals and third parties has been withheld. Please note that when processing FOI requests the Information Access Team only uses names and contact details within any contact or account fields, and these details have been withheld under Section 40(2) where they relate to an individual and under Section 44 where they relate to an identifiable business. Other fields are technically open for the team to fill in, but are not used for handling requests, so are not included in the data set, as the Information Access Team do not record entries into these fields when handling a request.

The text summary field has also been withheld using Section 40(2) and Section 44 because it contains details that would enable individuals and organisations to be identified. Request summaries are published alongside full responses on our website <u>here</u>, and these contain any summary information that we are able to disclose about individual requests. These can be searched by case reference or by using keywords.



Please also note that due to the way reports are run from our case management system, this means that there are occasional variations in field names within the resulting dataset. For clarity these have been listed below:

Case fields	Title in dataset
Case reference	ICOCaseRef
created by	N/A – withheld Section 40(2)
created on	CreatedOn
date time received	Date Received
Function	FunctionType
legislation	Legislation
	Legislationdetail
lasthandledby	N/A - withheld Section 40(2)
queue	Queue
sector	Sector
subsector	SubSector
Outcome	Decision
Decision 2	DecisionDetail1
Decision 3	DecisionDetail2
Closure Channel	ClosureChannel
Request Channel	RequestChannel
Status	CaseStatus
preservation reason	PreservationReason
age category	AgeCategory
child	Child
international controller	InternationalController
media interest	MediaInterest
preserved	Preserved
text summary	N/A – withheld (s.40/44)
priority case	PriorityCase
Elected Representative Correspondence	ElectedRepCorrespondence
Requested by	Requestedby

Contact/Account fields – only name and contact details used for request handling, details withheld as outlined above.

IR Activity fields	Title in dataset
Created On	Created date
Due Date	Response Due Date
Date Team Received	Received by Team Date



Subject	Same as case reference number (see case field above)
Datasets	Datasets
Proactive Disclosure	ProactiveDisclosure
Request Category	RequestCategory
Previous Case Ref	PreviousCaseRef
Date Acknowledgement Sent	Acknowledgement Sent Datetime
Date response sent	Response Sent Date
Late Response Reason	LateResponseReason
Received by ICO	Received By ICO Date
Primary Legislation Reason	Primary Legislation Reason
Additional Legislation Reason	Additional Legislation Reason
Late Response	Late Response
Withheld	Withheld
Reason Type	Reason Type
Withheld Reason	Withheld Reason

Finally, the column titled Case Completed Date in the data set is filled in with the current date automatically when the request handler completes the case, and does not fall under any of the above headings, but is included for completeness.

Information withheld - FOIA section 40(2)

Information about identifiable individuals has been withheld because it is exempt under section 40(2) of the FOIA.

Disclosure of this data would break the first principle of data protection - that personal data is processed lawfully, fairly and in a transparent manner.

There is no strong legitimate interest that would override the prejudice that disclosure would cause to the rights and freedoms of the individuals concerned. So we are withholding the information under section 40(2) of the FOIA.

Information withheld - FOIA Section 44 and DPA section 132

Information about identifiable third party organisations has been withheld in accordance with Section 44(1)(a), which states that:

"(1) Information is exempt information if its disclosure (otherwise than under this Act) by the public authority holding it -



(a) is prohibited by or under any enactment"

The enactment in question is the Data Protection Act 2018. Section 132(1) of part 5 of that Act states that:

"A person who is or has been the Commissioner, or a member of the Commissioner's staff or an agent of the Commissioner, must not disclose information which—

(a) has been obtained by, or provided to, the Commissioner in the course of, or for the purposes of, the discharging of the Commissioner's functions,

(b) relates to an identified or identifiable individual or business, and

(c) is not available to the public from other sources at the time of the disclosure and has not previously been available to the public from other sources,

unless the disclosure is made with lawful authority."

Section 132(2) lists circumstances in which a disclosure can be made with lawful authority, however none of them apply here. As a result, the information is exempt from disclosure.

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 <u>review procedure</u> 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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