

## **Freedom of Information Act 2000 (FOIA)**

### **Decision notice**

**Date:** 4 September 2024

**Public Authority:** British Broadcasting Corporation (BBC)

**Address:** Broadcasting House  
Portland Place  
London W1A 1AA

#### **Decision (including any steps ordered)**

---

1. The Commissioner's decision is that the BBC's interpretation of the complainant's request for information about its structure was reasonable and that, on the balance of probabilities, it holds no further relevant information.
2. It's not necessary for the BBC to take any corrective steps.

#### **Request and response**

---

3. The Commissioner is aware that, in response to an earlier request the complainant had submitted to the BBC, on 16 January 2024 the BBC advised the complainant:  
  
"However, as per our response to your previous request (RFI20231456) dated 24 November 2023, we will require further information regarding the departments, teams or individuals within the BBC that you would like our searches to include."
4. The complainant then submitted the following request to the BBC on 17 January 2024:  
  
"Please provide a list of all "departments, teams or individuals" in the BBC - for individuals, job titles will suffice."

5. The BBC responded to the request on 14 February 2024. It provided a list of job titles "in their associated job families" and the number of individuals with those job titles.
6. The complainant requested an internal review on 18 February 2024 because the BBC hadn't provided information about departments or teams.
7. The complainant didn't receive an internal review within the recommended timescale and submitted a complaint to the Commissioner on 11 April 2024.
8. The BBC then provided an internal review on 16 April 2024. The BBC noted that the request was for "departments, teams or individuals." It acknowledged that, in its response to the request, it hadn't referred to them as departments or teams but explained that it had used the terminology of "job families" because that's how the BBC describes its departments and teams.
9. In correspondence to the Commissioner on 16 April 2024, after they'd received the BBC's internal review, the complainant confirmed that the scope of their complaint is as follows:

"...they claim that the headings in the response are the names of departments or teams, but this is plainly untrue - they are groupings of jobs by type ("Journalism", "Business Management", not organisational units).

I therefore wish to continue to appeal the failure to provide the details of departments and teams."

10. In its submission to the Commissioner, the BBC says it wrote to the complainant again on 15 May 2024. In this correspondence it provided a table which included a list of Divisions, Sub-Divisions and Job Families within the BBC. In that response the BBC says it also explained that the list of job titles or roles that had been provided in response to the current request are arranged into 'job families' which are groups of related jobs, and that job families can sit across multiple Divisions and sub-Divisions.
11. Furthermore, the BBC says, it then wrote to the complainant again on 21 June 2024. In that correspondence it advised:

"There may also be "teams" within these "sub-divisions" – for example, within the subdivision "Legal", there is currently a number of teams which include Corporate Legal, Information Rights, Litigation etc. However, these "teams" are flexible and prone to change – due to the size and changing nature of the BBC workforce. If there was a specific

sub-division you were interested in, we can make further enquiries in relation to the current names of teams that sit within it, although doing this for all of the BBC would be likely to exceed the section 12 [cost] limit.”

## Reasons for decision

---

12. This reasoning considers whether the BBC’s interpretation of the request was reasonable and whether it holds any further information within scope of the request.
13. Section 1(1) of FOIA requires a public authority to (a) confirm whether it holds information an applicant has requested and (b) communicate the information to the applicant if it’s held and isn’t exempt information.
14. The complainant has told the Commissioner that the BBC hasn’t provided details of “departments and teams.” However, first, the complainant didn’t request departments **and** teams. They requested a list of “all departments, teams or individuals.” The Commissioner acknowledges that the complainant simply repeated a phrase the BBC had used. However, he nonetheless considers that a reasonable interpretation of the request is that it’s a request for a list of departments **or** teams **or** individuals.
15. Second, as above the Commissioner acknowledges that, in its earlier correspondence to the complainant, the BBC had itself used the phrase “departments, teams or individuals.” This quite reasonably led the complainant to believe those were terms the BBC uses because that’s how the BBC is structured.
16. However, the BBC subsequently explained that it doesn’t use the term “departments” [internally]. In its response to the request, the BBC had provided job titles in their associated “job families” and the number of individuals in those families (with caveats). Because it isn’t, in fact, structured into departments, the BBC doesn’t hold a lists of departments and can’t provide such a list.
17. The BBC had provided a list of what the Commissioner understands is broadly the equivalent of ‘departments’ – job families - with the job titles associated with them and the number of people with those job titles. Given its reasonable interpretation of the request, the BBC wasn’t required to provide a list of teams as well.

18. What the BBC had provided to the complainant was a list of its job families and the job titles associated with those families. The BBC subsequently provided the complainant with further explanation about its structure.
19. With hindsight, the BBC's initial communications with the complainant may not have been as clear as they could have been. However, the Commissioner nonetheless considers that the BBC's interpretation of the request was reasonable, that its original response fulfilled the complainant's request and complied with section 1(1) of FOIA, and that through its subsequent correspondence to the complainant, it has explained the situation more fully.

### **Other matters**

---

20. Provision of an internal review isn't a requirement of FOIA but is a matter of good practice. The FOIA Code of Practice recommends that an internal review be provided within 20 working days of the request for one. In only the most complex cases should a maximum of 40 working days be necessary.
21. The complainant requested an internal review on 18 February 2024 and the BBC didn't provide one until 16 April 2024. The Commissioner has recorded this for monitoring purposes.

## Right of appeal

---

22. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)  
GRC & GRP Tribunals  
PO Box 9300  
LEICESTER  
LE1 8DJ

Tel: 0203 936 8963

Fax: 0870 739 5836

Email: [grc@justice.gov.uk](mailto:grc@justice.gov.uk)

Website: [www.justice.gov.uk/tribunals/general-regulatory-chamber](http://www.justice.gov.uk/tribunals/general-regulatory-chamber)

23. If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.
24. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

**Cressida Woodall**  
**Senior Case Officer**  
**Information Commissioner's Office**  
**Wycliffe House**  
**Water Lane**  
**Wilmslow**  
**Cheshire**  
**SK9 5AF**