

17 April 2025

Case reference: IC-375439-V2J5

We are now in a position to respond to your information request of 4 April.

Request

"Please provide a copy of all the materials considered in your internal review dated 3 April 2025."

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

Our response

Your request relates to an FOIA request dealt with under ICO reference [IC-361623-H4C8](#) which is available on our disclosure log.

Please find enclosed the recorded information within scope of your request. This is an email exchange with our Public Advice and Data Protection Complaints (PADPCS) team. An internal email address has been redacted under section 31(1)(g) of the FOIA and further details on this exemption are provided below.

Section 31(1)(g) FOIA

We have redacted an internal ICO email address pursuant to section 31(1)(g) of the FOIA. This exemption refers to circumstances where the disclosure of information, 'would, or would be likely to, prejudice... the exercise by any public authority of its functions for any of the purposes specified in subsection (2).'

In this case, the relevant purposes contained in subsection 31(2) are 31(2)(a) and 31(2)(c) which state:

- a. the purpose of ascertaining whether any person has failed to comply with the law, and,
- c. the purpose of ascertaining whether circumstances which would justify regulatory action in pursuance of any enactment exist or may arise,

We are satisfied that any misuse of internal non-public facing email addresses that exist to support ICO staff would likely prejudice our ability to perform our regulatory functions. Public disclosure would leave the email address vulnerable

to phishing or other cyber-attacks, spam, or an increased volume of irrelevant correspondence which would divert resources to redirect correspondence to the correct departments.

There are other channels that are more appropriate for the public to contact us. These contact details are publicly available via our website.

The exemption at section 31(1)(g) is not absolute. When considering whether to apply it in response to a request for information, there is a 'public interest test'. That is, we must consider whether the public interest favours withholding or disclosing the information.

In this instance, the public interest factors in favour of disclosing the information are as follows:

- Increased transparency in the way in which the ICO conducts its operations.

The public interest factors in maintaining the exemption are as follows:

- Internal email addresses being utilised for purposes contrary to their intended purpose will reduce the effectiveness and efficiency of our regulatory functions.
- The disclosure of the information is not a critical part of the information in scope or of primary relevance to the request.
- The public interest relating to transparency is met by the provision of several other and more appropriate means of contacting the ICO.

Having considered all of these factors, we have taken the decision that the public interest in withholding the information outweighs the public interest in disclosing it.

This concludes our response to your request. We hope you found this information helpful.

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.

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.

Your information

Our [privacy notice](#) explains what we do with the personal data you provide to us, and sets out [your rights](#). Our [Retention and disposal policy](#) details how long we keep information.

Yours sincerely



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For information about what we do with personal data see our [privacy notice](#)