



ACCESS TO INFORMATION POLICY

Document Control

Reference: Access to Information Policy

Issue No: Version 1.1

Issue Date: February 2024

1. INTRODUCTION:

1.1 The purpose of this Policy document is to clearly outline the framework Uttlesford District Council will follow when managing Access to Information requests in line with our various statutory obligations and legal duties. Uttlesford District Council (hereafter referred to as UDC) is fully committed to conducting its affairs in a totally open and transparent manner enabling public access to information we may hold in our records wherever possible.

2. SCOPE:

2.1 Members of the public have a right to information about how the Council conducts its affairs and UDC is therefore required to publish such information in line with the Local Government Transparency Code 2015. Information relating to the Council's budget, minutes and agendas for both Council and committee meetings, key decisions taken, issues important to local people and a wide range of other information held by the Council is publicly available on our website and can be found via the attached link: www.uttlesford.gov.uk/transparency

2.2 Both the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR) gives members of the public the right of access to information held by the Council upon request, (unless there are sound reasons which would prevent open disclosure of certain information, in which case an exemption under FOIA or an exception under EIR may apply).

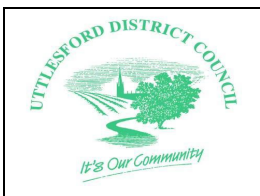
2.3 Under the principles of General Data Protection Regulations (UK GDPR) and rights granted under Data Protection Act (DPA) 2018, individuals may also request information about themselves if held by the Council. They also have a number of additional rights such as rectification, objection and in some cases erasure, all of which may be subject to certain conditions. If a person makes a request seeking their own personal data held by the Council, this will be regarded as a Data Subject Access Request (DSAR) and will be managed by the Data Protection Officer (DPO).

2.4 UDC may also receive requests for information from other bodies such as the Police and other Government Departments or Authorities under the terms of the Data Protection Act 2018 (DPA) and such information may be disclosed if certain criteria are met. These requests may include evidence of proof of life and other information necessary for the prevention of crime and/ or detection of fraud etc.

2.5 This document is therefore designed to outline the framework for dealing with all requests for information received by UDC and to provide staff with a source of information on how each should be processed to fully accord with the respective legislation.

3. COMPLIANCE WITH THIS POLICY:

3.1 All UDC employees, whether full or part time, temporary staff, agency support officers, volunteers are required to handle information requests in a way that complies with this policy. Staff should also be aware that deliberate concealment, amendment, or destruction of requested



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information with the intent to prevent disclosure is a criminal offence under Section 148 (2) of the Data Protection Act 2018 and could lead to very serious consequences. Where there is clear evidence that suggests any member of staff has wilfully, deliberately, or negligently failed to apply the guidance outlined in this policy document then the matter will be fully investigated and could result in disciplinary action being taken.

3.2 All managers throughout the Council are responsible for ensuring that their staff and others they recruit on a temporary basis for work within their service area(s) are fully aware of the requirements of this policy and routinely comply with their legal obligations at all times when performing their duties.

4. KEY RESPONSIBILITIES:

Chief Executive:

4.1 The Councils Chief Executive has overall corporate responsibility to ensure that the Council conforms to and implements Access to Information legislation. Uttlesford District Council is accountable to the Information Commissioner for its compliance with the Freedom of Information (FOIA) 2000, Environmental Information Regulations 2004 (EIR) and Data Protection Act 2018 (DPA) legislation.

Senior Information Risk Owner (SIRO)

4.2 The Councils Senior Information Risk Owner (SIRO) has responsibility for managing the Councils Information risk policy and for all information/ data assets held by the Council. The SIRO will ensure that this Access to Information policy is reviewed on a regular basis for both accuracy and currency together with the Data Protection Officer.

Monitoring Officer

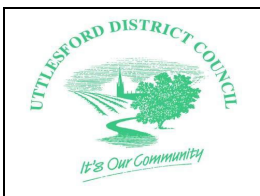
4.3 The Councils Monitoring Officer (MO) is responsible for all matters relating to the conduct of Councillors and officers and for the operation of the Councils constitution. The MO has a duty to report to Council and cabinet any instances where they are of the opinion that any proposal, decision or omission is likely to be illegal or would constitute maladministration.

Strategic Directors/ Directors

4.4 Strategic Directors and Directors are responsible for ensuring that each service area within their respective directorate effectively responds to requests for information in a timely basis in line with the statutory deadlines. They may direct service managers to intervene or take other positive action to hasten any response from an individual service area.

Service Managers

4.5 All Service managers within the Council are responsible for ensuring that all requests for information received by their service are properly actioned and a response issued within the statutory deadlines, unless there is a justifiable reason for an extension of the deadline or a delay in



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the response being applied. Service managers will be required to regularly review and monitor their own team's performance in supplying a response to information requests and to ensure sufficient resources are in place.

Data Protection Officer

4.6 The Data Protection Officer (DPO) is responsible for overseeing the Council's efficient management for processing all requests for information. The DPO will co-ordinate and oversee the activities of the Information Governance Team (IG) and will provide regular update reports to the Corporate Management Team (CMT) on levels of performance or any other Information Governance matters which may require attention. The DPO will remain available to all managers and staff to provide advice and assistance regarding any complex issues associated with requests for information.

Information Governance Team

4.7 The Council has a small team of officers (IG Team) whose role is to manage the information request process. The IG team will register each request on the Council's systems upon receipt and acknowledge each request with the requestor. In addition, they will provide an indication of the likely timeline for which the requestor may receive their data. The IG team will then forward the request onto the appropriate service area(s) for action.

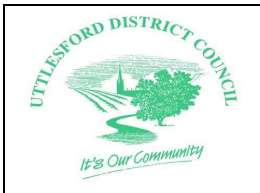
4.8 The Council operates a devolved approach to all requests for information meaning that experts from each service area who have the specific knowledge of the nature of the information sought in each case are responsible for developing and preparing the final response to the requestor.

Information Governance Service Champions (IGSC)

4.9 Most service areas have appointed an Information Governance Service Champion (IGSC). Who the central IG Team will first consult and then forward each request to the relevant IG service champion so that it receives appropriate attention. The IG service champion will thereafter co-ordinate all the information required for preparation of a suitable response, seeking support and assistance from their managers and other colleagues who may hold information in each case.

Legal Services

4.10 Solicitors from the Council's Legal service are responsible for providing expert legal advice to UDC officers to ensure they can meet their obligations to respond to requests for information in a timely fashion. UDC's solicitors will also provide a service to officers for approving or declining any FOIA exemption or EIR exceptions application they receive and will undertake checks to ensure any refusal of disclosure is appropriate, justifiable and in line with the governing legislative criteria. They will also consider whether the public interest test has been correctly completed and that it satisfactorily explains the rationale for refusal in each case where applied.



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All UDC Staff

4.11 All UDC staff must process information and requests for information in a way which complies with this policy and standards of good practice. Staff are required to provide every assistance and support to their service IG champion and other colleagues in complying with requests for information they may receive either directly or indirectly. Staff must ensure that they provide all information they hold, which falls within the scope of the request, in a timely manner to ensure that the Council can fully comply with the appropriate timelines for responses as defined by legislation.

5. INFORMATION REQUEST - MANAGEMENT PROCEDURES:

5.1 UDC Publication Scheme:

5.1.1 Section 19 of the FOIA 2000 requires public bodies to be proactive in the release of official information they may hold in their records. The Local Government Transparency Code 2015 requires Local Councils to publish certain information to make it easier for local people to contribute to the decision making and enable them to shape public services.

5.1.2 To comply with our legal obligations in this respect UDC has produced a publication scheme on our website, giving details of what information it already makes available or intends to publish as a matter of course.

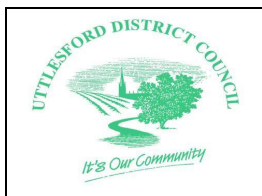
5.1.3 The Councils Publication Scheme is divided into the following classes of information:

1. Who we are and what we do
2. What we spend and how we spend it
3. What are our priorities and how are we doing
4. How we make decisions
5. Our policies and procedures
6. Lists and Registers
7. Services provided by the Council

5.1.4 Publication of information via this scheme delivers a number of clear benefits, such as the reduction in the amount of information that can be subject of other individual requests for information made to the Council.

5.2 FOIA & EIR Requests:

5.2.1 In meeting our obligations for responding to Freedom of Information (FOIA) and Environmental Information Regulations (EIR) requests the UDC will take account of the guidance contained within the [Code of Practice document issued by the Ministry of Justice under Section 45 of the FOIA 2000](#).



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5.2.2 The Council will also take account of any guidance which is issued from the Information Commissioners Office (ICO) with regards to best practice on the management of information requests.

5.2.3 All requests for information received by the Council made under either FOIA or EIR will be processed strictly in accordance with the aforementioned Code of Practice and the requestor will normally be supplied with a response to their request within twenty working days from the date the request was first received.

5.2.4 Only in exceptionally limited cases where the request is either considered complex or may require further consideration of the public interest may the twenty working days timeline be extended and normally no longer than a maximum of forty working days. In cases where an extension of the timeline for a response is necessary, the requestor will be notified by the officer dealing of the reasons at a very early stage in the process and advised of the new date for which they should expect to receive the information sought.

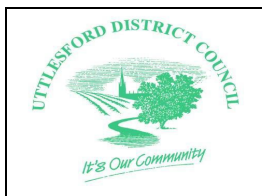
5.2.5 Upon receipt of the information request a member of the Councils Information Governance team (IG) will make a record of the request within the Councils information register. They will allocate the request a unique reference number and formally acknowledge receipt to the person making the request. This formal acknowledgement will advise the requestor of the timeline in which they can expect to receive their response, which will normally be twenty working days from the date the request was first received unless deemed complex.

5.2.6 The IG Team will conduct an initial triage assessment of the request and will consider whether any of the following actions as shown in Table 1 below might apply:

Common examples	Considered Actions
1. Is the request considered valid?	If no name has been supplied or the contact details are not clear, then a refusal will be issued until the requestor can supply correct details
2. Does the Council hold the information being sought or is such information held by other authorities or organisations?	Requestor will be advised the Council does not hold information within the scope of the request or alternatively directed to another organisation.

Table 1

5.2.7 Once this initial assessment has been successfully completed the request will then be forwarded to the appropriate Information Governance service champion so that action can be taken to collate the information sought to provide a response to the request. The IG team at this early stage may also provide additional advice and assistance to the IG service champion in the event that their initial Triage assessment identifies any points which may require further action.



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5.2.8 The IG Service champion may make a further review of the request and consider whether any of the following actions might be necessary, as shown in table 2 below:

Common examples	Considered Actions
1. Has the request been clearly defined?	If the request is not clear on the information sought the requestor will be asked to provide more clarity or additional detail so that searches can commence.
2. Is the request considered complex?	Requestor will be advised that an extension to the timeline for response will be applied and advised of the reasons why this is necessary
3. Is the request considered repetitive, vexatious or manifestly unfounded?	Consideration will be given to refusing the request and applying an exemption (FOIA) or Exception (EIR) if appropriate.
4. Is sourcing the information to meet the request likely to exceed the cost threshold recommended by the Cabinet Office. (Not EIR)	Advise the requestor that the request is refused under section 12(1) FOIA 2000 and provide the requestor the opportunity to refine the scope of the request to bring this back within the cost threshold

Table 2

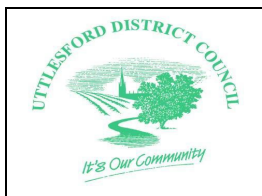
5.2.9 If the request successfully meets the criteria for processing the service IG champion will coordinate all work to source the information for the request, seeking support from their managers, and colleagues. Where the information may be held in more than one service area they may consult with colleagues from other service areas so that a consolidated response can be prepared.

5.2.10 The Councils formal response to any request will be reviewed for accuracy by the IG service champion and then checked by a line manager before being finally sent to the requestor. This is to ensure that the response contains no information that falls outside the scope of the request, any third party data, or information which was given to the Council in confidence, is disclosed in error.

5.2.11 A copy of the final response and any other correspondence relating to the request will be copied to the Councils IG Team so that the Information register and systems can be updated, and progress recorded.

5.3 Consideration of Costs (where appropriate):

5.3.1 The Council will normally provide responses to all requests for information free of charge subject to provisions of Regulation 4 of FOIA 2000 and the cost threshold recommended by the Cabinet Office as defined in paragraph 5.2.1 above.



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5.3.2 Where the cost of meeting the request would exceed the “appropriate limit” defined within the Cabinet Office Code of Practice (currently £450, or 18-hours staff time based on £25 per hour) then the Council is not bound to comply with the request and may issue a refusal under Section 12 FOIA 2000.

5.3.3 When estimating the cost, the Council can consider the following factors:

- Determining whether the information is held by the Council
- Locating and sourcing the information or documents
- Retrieving the information
- Extracting the information from documents

5.3.4 Where it is apparent that a requestor has sought to split a large request up into several smaller requests or alternatively similar requests are submitted from different persons who appear to the Council to be acting together in pursuance of a campaign, and these requests are submitted within 60 working days of each other, then the Council may apply aggregated costs to the requests and consider these together. The Council can refuse to provide the information, if the total exceeds the appropriate limit.

5.3.5 In cases where the cost does exceed the threshold then the Council will seek to provide the requestor(s) with reasonable advice and assistance where refining or a narrowing the scope of the request may serve to reduce the cost and burden to Council resources and the public purse.

5.4 Format and method of supplying response

5.4.1 UDC will normally provide the information direct to the requestor by electronic means (i.e., email or shared link).

5.4.2 Following advice from the Information Commissioners office, the Council will no longer provide responses to any FOIA or EIR requests in Excel spreadsheet format to reduce the risk of a potential data breach occurring. [More details of the ICO's advisory notice on this subject](#) can be found on the ICO website. Evidence has shown that large and often complex spreadsheets may contain personal data which can be hidden in pivot tables and might only be known to the author of the document. The requirement for requests to be supplied in Excel format has therefore been withdrawn and alternative formats such as portable document format (PDF) will now be used.

5.4.3 Where the requestor has specifically asked for a response in hard copy documents or other formats then the Council may seek to apply a “reasonable charge for disbursement” costs of printing, photocopying, postage and supplying the information in the particular format requested. These disbursement charges are shown in table 3 below:



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Photocopies of documents

Paper size	Black & White	Colour
A4	10 pence per side	50 pence per side
A3	20 pence per side	70 pence per side
Compact disk	50 pence	
USB memory stick	£3.00	

Translation Costs:

May also be applied to translate information into a language other than English.

(The Council will not seek to apply charges for costs arising from meeting our obligations under disability or other equality legislation).

Postage:

Applicants may also be expected to meet the postage costs which will be based upon current Royal Mail Charges.

Table 3

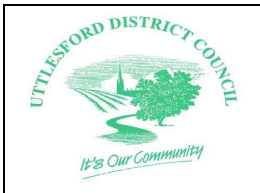
5.5 Environmental Information requests

5.5.1 When considering costs for meeting EIR requests the Council may charge a “reasonable amount” for the supply of information as defined within Regulation 8. This can include the following:

- Reasonable costs of production and delivery of the information,
- Staff costs incurred to extract and provide the information,
- All charges relating to EIR requests will be waived for any applicant in receipt of certain benefits at the time of submitting their request for environmental information to the Council. Applicants in receipt of benefits will be required to provide evidence, such as their most recent award letter from the Department for Work and Pensions (DWP).

5.6 Fees notice

5.6.1 Where a fee is required for the Council to undertake a response to an FOIA or EIR request, the requestor will be issued with a fee's notice and the information will not be provided until the applicant has paid the fee. Once the requestor is issued with the fees notice and the cost for meeting the request, they will then have three (3) months from the date the application is received to pay this fee. If the fee is not paid during this period, then the request may lapse and the response will not be issued.



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5.7 FOI Exemptions / EIR Exceptions:

5.7.1 Both FOIA and EIR legislation requires the Council to consider whether disclosure of the information sought is within the public interest. The Councils response to any FOIA and EIR requests are always considered to be information which could be released to the public therefore in some cases it might not be possible to release certain information. Some examples of this are where information may have been given to the Council in confidence, may contain commercial information, trade secrets, or more commonly might contain information relating to a third party where disclosure would breach the UK GDPR principles and the rights of the third party.

5.7.2 There are several FOIA exemptions and EIR exceptions which may be applied where a refusal of a request for information might be necessary, but only where a strict criterion is met. The refusal of a request under FOIA and EIR legislation can be a complex issue therefore whenever officers are considering whether to refuse to disclose certain information in response to a request then they may wish to consult with the Councils Data Protection Officer and Information Governance manager.

5.7.3 The application of any FOIA exemption or EIR exception being considered by officers must first be approved by a solicitor from the Councils Legal team who will review the officers rationale, justification and where the use of a "qualified exemption" is sought the member of the Legal Team will ensure that the public interest test has been correctly applied.

5.8 Copyright and Intellectual Property Rights applied:

5.8.1 UDC will not place any conditions or restrictions on an applicant, for any information supplied under the statutory provisions. The Council may however include a copyright notice with the disclosed information where appropriate.

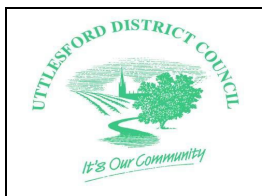
5.8.2 The FOI Act does not affect an information owner's copyright and intellectual property rights allowing them to protect their original work against commercial exploitation by others. Any FOIA applicant who wishes to re-use the information for commercial purposes should make an application to the Council, under the Re-use of Public Sector Information Regulations 2015.

6. Complaints Procedure/ Internal review:

6.1 Whilst Uttlesford District Council will make every effort to ensure that requests for information are dealt with both promptly and efficiently, there may be occasions where the requestor is not content with the way their request has been managed or who otherwise remain unsatisfied with the response they have received.

6.2 In such cases the person originally making the request has the right to seek an Internal Review for one of the following reasons:

- the Council's handling of a request for information (e.g. a late response to a request).
- the Council's decision whether to release information; or
- the Council's compliance with its Publication Scheme



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6.3 The Internal review process provides a fair and thorough review of any handling issues and of any decisions taken. In cases where information has been refused or is exempt, the review will consider whether the use of any exemption or exception is appropriate, the public interest test has been applied fairly or whether a fresh decision should be taken of any relevant factors raised by the requestor.

6.4 Requestors will be advised of their right to seek an internal review in their response to their original request which will include details on how to request an internal review and who they should contact.

6.5 Applicants seeking an internal review should make their request in writing to the Information Governance team at FOI@uttlesford.gov.uk within 40 days of the date of the Council's response to their original request. They should provide the reasons why they disagree with the Council's response or why they are dissatisfied with the Council's handling of the request. Applicants may also include any supporting evidence or representations which will be considered as part of the review process.

6.6 Applicants seeking an internal review should expect the following:

- Requests for internal reviews will be acknowledged within 5 working days of receipt and will contain advice on when the requestor should expect a response,
- Requests for internal review will normally be responded to within 20 working days,
- If the internal review is considered complex, involves review of a large volume of correspondence or where third parties may need to be consulted, then it may be necessary to extend the deadline for a response by a further 20 working days. The internal review process will not exceed a total of 40 working days,
- The officer appointed to conduct the internal review may contact the applicant should they require further information or clarity before they can complete the review,
- The review will be dealt with in a fair and impartial manner and will be undertaken by a senior officer unconnected with the initial decision,
- The appointed senior officer conducting the internal review will be knowledgeable and experienced in the appropriate legislation,
- The review will take account of the way in which the request was handled and whether this was in-keeping with the Council's Access to Information policy and may include decisions relating to any public interest test for engagement of qualified exemptions or exceptions,
- The review will also take account of any concerns raised by the applicant,
- The review could result in either the Council upholding its original decision, applying additional exemptions, or issuing a new response where disclosure is approved,

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- The requester will be informed, in writing, of the outcome of the review, giving a full explanation,
- If the outcome of the review is to disclose material that had previously been withheld, then this will be provided to the applicant at the time of the response. If the Council is unable to comply with this, they will inform the applicant when the information will be disclosed to them and any reason for delay,
- The Council will make the requester aware of their right to complain to the ICO if they continue to remain dissatisfied with the outcome of the review.
- The Council will keep a record of all reviews and decisions made.

6.7 If for any reason the applicant remains unsatisfied with the outcome of the internal review, they have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone: 0303 123 1113 or 01625545700
Website: www.ico.org.uk.

7. Data Subject Access Requests:

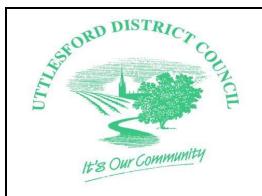
7.1 UK GDPR gives individuals a right to request their own personal data if held by the Council and such requests for personal data will be treated separately as a Data Subject Access request (DSAR) under the terms of Section 12, Data Protection Act 2018.

7.2 The Council's Data Protection Officer (DPO) will deal directly with all DSAR requests received and will consult with service managers and staff from individual service areas to source data held by each service so that a formal response to the requestor can be made within the appropriate timeline of one month from date of first receiving the request.

7.3 The Council will seek to provide data in response to a DSAR free of charge direct to the requestor by electronic means (i.e. email or shared link to UDC systems) unless the requestor seeks the data to be supplied in another particular format.

7.4 In exceptional circumstances where a request is considered to be "manifestly unfounded or excessive" or where the individual requires further copies the Council may seek to charge a "reasonable fee" to cover administrative costs associated with complying with the request.

7.5 More detailed information on how the Council deals specifically with Data Subject Access requests can be found in the Council's DSAR policy.



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8. Requests for disclosure of personal data from Police and other Agencies

8.1 Occasionally the Council may receive a request seeking details of personal data we hold from competent authorities such as the Police, HMRC, other Local Authorities or Public Bodies for specific purposes.

8.2 The Data Protection Act 2018 is very clear as to when personal data may be disclosed without the explicit consent of the “data subject.” and receipt of such a request of this nature does not give an automatic right for access to the information sought. The Act states that public bodies should assess the merits of requests made under the various DPA schedules and decide whether to apply an exemption to disclosure. Each request must be assessed separately and, on a case-by-case basis to determine whether the criteria has been properly met.

8.3 Information may be requested under either of the following:

i) Schedule 2 Part 1 Paragraph (2)(1)

Requests for to personal data can be made without the consent of the Data Subject for the purposes of

- Prevention and detection of crime
- The apprehension or prosecution of offenders
- The assessment or collection of tax or duty or an imposition of a similar nature

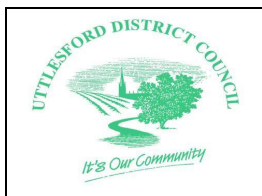
ii) Schedule 2 Part 1 paragraph (5)(1-3)

Under the terms of this schedule the Council may consider the disclosure of personal information where it is required for legal proceedings

8.4 Each application made to the Council for disclosure of information under any of the above conditions must be submitted on an appropriate organisational form which outlines the reasons why the information is being sought. The form requesting the disclosure of data must be signed by the officer or person making the request and countersigned by a senior officer or line manager within the organisation.

8.5 In instances where requests are received from Police Forces the College of Policing gives clear guidance and each Force should have a template form for use for this purpose. The form submitted in each case should be completed by the officer dealing with the case and should include a section for the details and signature of the countersigning senior officer/ managers details.

8.6 Such requests may be received by the Councils Data Protection Officer or via other means direct to officers within the various Council services. Whichever route the request is received, officers considering whether to disclose data or otherwise must apply due diligence by taking the following actions:



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Officers should consider:

- Does the request come via a recognised route (i.e., Police PNN or organisational account),
- Am I confident that this is a genuine request,
- Is the request clear, or do I need to seek further clarification,
- Has the requestor clearly defined why the personal data is being requested,
- Is the information being sought relevant to the reasons outlined in the form,
- Has the request form been countersigned by a senior officer or manager,
- Is there a clearly defined legal basis underpinning the disclosure,
- Has the requestor explained any potential risks/ or impact which would occur if the information was not disclosed,
- Is there an immediate risk of potential harm if the information is not disclosed,
- Am I authorised to disclose this information from my service,
- Should I consult my manager and /or the DPO to seek guidance first.

8.7 In these circumstances a timely response is usually an important factor to the requestor however officers should not rush into disclosing information to external bodies and organisations before carrying out the above checks.

8.8 If the decision is taken to disclose the information sought then the officer must keep a proper record of the request made and any information shared in each case within their respective service disclosure register.

8.9 When in doubt officers are encouraged to seek guidance from the Data Protection Officer who will be happy to give advice specific to any request they may receive directly.

Document Owner:

The Data Protection Officer is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the requirements of UK GDPR.

Change History Record:

Issue	Description of Change	Approval	Date of Issue
Version 1.1	Initial	Director of Digital Innovation and Commercialisation	February 2024