



**Information Policy & Compliance**

[bbc.co.uk/foi](http://bbc.co.uk/foi)

David Hansen

By email to [foi@bbc.co.uk](mailto:foi@bbc.co.uk)

22 September 2008

Dear Mr Hansen

**Freedom of Information request – RFI20081038**

Thank you for your request for information under the Freedom of Information Act 2000 (“the Act”), which was received on 18<sup>th</sup> September. You asked for the following information:

*“the information the BBC used to make the statement that “the BBC does not consider that postcodes normally constitute personal data””*

The above statement was made after discussion within the Information Policy & Compliance team.

During this, we considered the Data Protection Act itself

([http://www.opsi.gov.uk/acts/acts1998/ukpga\\_19980029\\_en\\_1](http://www.opsi.gov.uk/acts/acts1998/ukpga_19980029_en_1)), and the Information Commissioner's Office guidance on what constitutes personal data

([http://www.ico.gov.uk/upload/documents/library/data\\_protection/detailed\\_specialist\\_guides/160408\\_v1.0\\_determining\\_what\\_is\\_personal\\_data\\_-\\_quick\\_reference\\_guide.pdf](http://www.ico.gov.uk/upload/documents/library/data_protection/detailed_specialist_guides/160408_v1.0_determining_what_is_personal_data_-_quick_reference_guide.pdf)) This is the only recorded information held in relation to your request, and both of these documents are readily accessible online.

We considered the first question in the above guidance “Can a living individual be identified from the data, or, from the data and other information in your possession, or likely to come into your possession?” As postcodes normally identify a number of houses, or a house with more than one occupant, we concluded that in those cases, postcodes will not be personal data because, without further information, it would not be possible to identify individuals. We considered that where a postcode identified one house with one occupant, this would constitute personal data, which is why we wrote postcodes are not *normally* considered to be personal data.

In the ICO decision you refer to (reference FS50169424), the Information Commissioner noted in that case that in some cases, a postcode relates to a single address. The Information Commissioner concluded that in this case postcodes constituted personal data and disclosure would be unfair



because they could be used together with information already in the public domain, allowing individuals to be identified.

*Appeal Rights*

If you are not satisfied with this response you have the right to an internal review by a BBC senior manager or legal adviser. Please contact us at the address above, explaining what you would like us to review and including your reference number. If you are not satisfied with the internal review, you can appeal to the Information Commissioner. The contact details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone 01625 545 700 or see <http://www.ico.gov.uk/>

Yours sincerely

Rachel Hallett  
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