



S Smith  
request-337067-6db56d13@whatdotheyknow.com

FOI Reference: FOI323082  
22/07/2016

Dear S Smith

I refer to your request where you asked:

“1. Can you please provide a list of the names of each Bulk Personal Dataset held by the Department for purposes other than National Security, and, for each dataset:

- a) the purposes for which the dataset is held,
- b) the size of the dataset (in terms of either terabytes of disc space, or millions of people, or both),
- c) how many copies of the dataset are floating around the department, and the source of that figure (i.e. whether that figure is as a result of copy control measures, a comprehensive audit, or guesswork)

If any part of the above is not held for any particular dataset, it is sufficient to say that the information isn't held because you don't know.

2. Can you please provide the definition of "Bulk Personal Dataset" that was used to reply to that previous request, and the source of that definition? If it defines "Personal data", can you include the source of that definition, or confirm whether that is section 1 of the Data Protection Act.”

In reliance on the exclusions in Section 31 (1) (a) of the Freedom of Information Act, which relates to law enforcement, I can neither confirm nor deny whether any of the information you have requested in the first part of your request is subject to the exemption at section 31 (a) of the Act.

Section 31 (1) (a) of the Freedom of Information Act exempts information if its disclosure would prejudice the prevention or detection of crime. The information requested contains very sensitive personal and other sensitive material that would be of interest to someone with mischievous intent on the department and could encourage them to wrongfully try to access our IT systems to try and locate that information. This would therefore make the detection of this sort of crime more difficult. The exemption in Section 31 is a qualified exemption and I have considered whether the balance of the public interest favours releasing or withholding this information. There is a general public interest in the disclosure of information and I recognise that openness in government may increase public trust in and engagement with the government. I also recognise a public interest in assuring the public that effective arrangements are in place for the prevention and detection of crime. I have weighed those public interests against a strong public interest in the prevention and detection of crime. It is contrary to this public interest to disclose information which would facilitate the commission of crime

or hinder its detection. Taking into account all the circumstances of this case, I have concluded that the balance of the public interest favours withholding this information.

Regarding your second question, I can confirm that the department holds information relevant to your request. HMG does not have a formal definition of bulk data which has been formally published but below is the **working criteria** which is used to differentiate data from other data sources.

The Cabinet Office's Working Criteria of Bulk data is:

An electronic collection of related information comprising of aggregated records originating from one or more datasets.

- a) Which holds Personal data.
- b) Are not in the public domain
- c) Are held by a Ministerial or non-Ministerial departments (including Executive Agencies) and where the department remains the Data Controller (either singularly, joint or in kind)
- d) Are vulnerable to cyber or technical attacks e.g. are directly or indirectly connected to the internet.
- e) Where the loss, exposure or compromise of the Bulk dataset will lead to significant financial, personal, physical or reputational harm to:
  - a. The department or to HMG; or
  - b. The data subject

The source of this working criteria is from a document that originates with the Cabinet Office, which we are withholding under Section 35 (1) of the Freedom of Information Act (the formulation or development of government policy). We are withholding this information because the Government's policy on security risk management is still under development and decisions have not been made yet.

If you have any queries about this letter, please contact the FOI team. Please remember to quote the reference number above in any future communications.

If you are unhappy with the service you have received in relation to your request or wish to request an internal review, you should write to:

Sharon Carter  
Cabinet Office  
70 Whitehall  
London  
SW1A 2AS

email: [foi-team@cabinetoffice.gov.uk](mailto:foi-team@cabinetoffice.gov.uk)

You should note that the Cabinet Office will not normally accept an application for internal review if it is received more than two months after the date that the reply was issued.

If you are not content with the outcome of your internal review, you may apply directly to the Information Commissioner for a decision. Generally, the Commissioner cannot make a decision unless you have exhausted the complaints procedure provided by Cabinet Office. The Information Commissioner can be contacted at:

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Yours sincerely

A handwritten signature in black ink, appearing to be 'A. B.', written in a cursive style.

**FOI Team**  
**Cabinet Office**