



Department for  
Digital, Culture,  
Media & Sport

Freedom of Information Team  
Department for Digital, Culture, Media & Sport

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IR2022/00151

3 February 2022

Dear Carl Heaton,

Thank you for your correspondence of 6 January, in which you requested an internal review of the department's response to your request for information on 6th November. Your previous request was for the following information:

***Please provide all correspondence in any format it exists occurring during 2021 to date which is:***

***1. between DCMS and UK Safer Internet Centre (including the charities or individuals behind namely Internet Watch Foundation, SWGfL and Childnet, Heidi Jane KEMPSTER, William James GARDNER, Susie HARGREAVES or other officers of).***

**AND**

***2. between DCMS and Nominet making any reference to charity including UK Safer Internet Centre (including the charities or individuals behind namely Internet Watch Foundation, SWGfL and Childnet, Heidi Jane KEMPSTER, William James GARDNER, Susie HARGREAVES or other officers of).***

***Thank you for the update, to save later time / further FOIA request and review can we also expand the relevant persons to include "Paul Fletcher" a former trustee of SWGL and the incoming Nominet CEO please?***

The department responded on xx DATE (our reference FOI2021/19454) ....  
You have now requested an internal review, as follows:

***Please pass this on to the person who conducts Freedom of Information reviews.***

***I am writing to request an internal review of Department for Digital, Culture, Media and Sport's handling of my FOI request 'Communication between DCMS and UK Safer Internet Centre, IWF, ChildNet and SWGFL'.***



***I would like to know:***

- 1) How many emails were exchanged between Nominet, DCMS and the named parties during each month of 2021.***
- 2) The cost to furnish a separate FOIA request for each of those months.***
- 3) The cost to furnish a FOIA request for all months.***
- 4) How your FOIA process differs between a 1 day, 1 month or 1 year period of request.***
- 5) The results of your internal review of the previous FOIA response.***

In order to ensure cases are looked at afresh, internal reviews of Freedom of Information (FOI) requests are carried out in our department by officials unconnected to the handling of the original request. I was therefore asked to conduct the internal review and I present my findings below.

Having reviewed the handling of the request I have upheld the original decision that your request engages the cost limit set out in section 12 of the Freedom of Information Act 2000 (the Act). Having consulted with some relevant officials we believe we have around 350 emails that would fall within scope of your request held across a number of teams and officials across the department. To find and collate these emails would engage the cost limit.

To help explain in more detail why the department has that volume of email traffic it is worth noting that the department engages with the companies within scope of part 1 of your request frequently. Each of those organisations has interactions with different teams in the Department, in a number of areas. As well as interactions related to the UK Safer Internet Centre partnership of the IWF, ChildNet, and SWGFL. These may be to do with government online safety policy, specific projects and initiatives of those organisations, as well as meetings or events.

Your request covers all emails with those organisations and is not limited by content or in any other way, therefore, we would need to provide 11 months worth of emails with these organisations. We consider this engages the cost limit.

We believe part 2 of your request on it's own does not engage the cost limit.

Regarding your supplementary questions, see below our responses.

For questions 1-3 we regret that this also engages the cost limit. As we have explained above, we would need to consult with a wide number of staff to collate this information, and to understand the volume of emails per month would require the same volume of work as the original request as we would need to collate these all and review the dates they were sent before presenting the volume per month. As we are unable to respond to the first question within the cost limit, we are, therefore, unable to respond to questions 2 and 3 within the cost limit as they follow on from question 1.

In response to part 4 of your supplementary questions, it is not entirely clear what is requested. If you are asking how long the department believes it would take to collate information covering either a 1 year, a 1 month or 1 day request, then as explained above

this would be difficult to confirm. The department expects we would need to consult upwards of 75 staff covering several directorates to confirm whether information is held and collate that information. The volume of staff we would need to consult with would remain the same irrespective of whether the request covers a 1 day, 1 month or 1 year period. The volume of information held will of course differ.

In order that you can submit a request that is able to be responded to within the cost limit I suggest you take some or all of the following actions. You should reduce the number of people within scope of the request by reducing the number of people we would need to consult with. You can do this by either choosing certain named senior staff members or ministers, or by reducing your request to cover officials within certain directorates, such as the 'Security and Online Harms' directorate. You may also like to refine part 1 of the request by limiting the correspondence by subject. At present your request requires the department to collate *every* email sent to/received from the relevant organisations within the timeframe, a more refined request which seeks only emails on a certain topic/s *may* be answerable within the cost limit.

Yours sincerely,

Freedom of Information Team  
**Department for Digital, Culture, Media and Sport**

### **Complaints and comments**

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner's Office have a complaints form which you can utilise to make a complaint. This can be found here:

<https://ico.org.uk/make-a-complaint/official-information-concerns-report/official-information-concern/>.

