

Robert Toone

FOIA Ref 2020/0054

By email only:

[request-640567-
95529e80@whatdotheyknow.com](mailto:request-640567-95529e80@whatdotheyknow.com)

14 April 2020

[request-640704-
6071ef77@whatdotheyknow.com](mailto:request-640704-6071ef77@whatdotheyknow.com)

Dear Robert

**REQUEST FOR INFORMATION UNDER THE FREEDOM OF INFORMATION ACT
2000**

Please find below TfGM's response to your Freedom of Information request which was received at this office on 03/02/2020.

Information requested as set out below:

"I wish to see copies of all emails sent to (and from) all of your Data Collectors and Field Supervisors as far back as records exist. I understand this may take you a while but nevertheless I request it.

Additionally I request all copies of staff meetings minutes/bullet points be them monthly, quarterly or otherwise that exist in the Data Collection (Service Assessment) archive up to and including the present date, as far back as records exist."

"Please inform me of what external checks are made and indeed have been made on your Data Collectors in respect of not questioning people on CPS data and SSS (Origin and Destination) surveys. I am not including checking by your own Data Field Supervisors (as this can be open to abuse as supervisory staff may have favourites and not be objective and may understandably 'cover up' for their favourite individuals yet single out others not favoured for disciplinary action) but by other staff in your organisation or mystery shoppers or members of the public.

Please inform me of actions or sanctions taken against offending Data Collectors of course inasmuch as the Data Protection Act allows.”

The previous 6 months from September 2019-February 2020

Section 12 of the Act makes provision for public authorities to refuse requests for information where the cost of dealing with them would exceed the appropriate limit, which for Local Government is set at £450. This represents the estimated cost of one person spending 18 hours at £25 per hour in determining whether the Council holds the information i.e. in locating, retrieving and extracting the information.

When a public authority is estimating whether the appropriate limit is likely to be exceeded, it can include the costs of complying with two or more requests if the conditions laid out in Regulation 5 of The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 can be satisfied. Those conditions require the requests to be:

- made by one person, or by different persons who appear to the public authority to be acting in concert or in pursuance of a campaign;
- made for the same or similar information; and
- received by the public authority within any period of 60 consecutive working days.

The above two requests fulfil these criteria and are therefore being considered together.

We have estimated that we hold the following for the 6 month period you have requested.

Emails between supervisors and field staff – 13,000

Briefing emails, documents and meetings – 1000

Mystery Shop – 2

Estimating that it would take a minimum of 1 minutes per email and 5 minutes per document to retrieve, review and redact the following time as been estimated

Emails between supervisors and field staff – 216 hours

Briefing emails, documents and meetings – 83 hours
Mystery Shop – 10 mins

As noted above we have considered your requests together as they are of the same subject matter. However, in relation to information about actions or sanctions taken against offending Data Collectors it is likely that the numbers would be sufficiently low and the requested information could be combined with other information to identify a living individual, therefore deeming it personal data. Under section 40(2) of FOIA by virtue of section 40(3)(a)(i), personal data of a third party can be withheld if it would breach any of the data protection principles to disclose it. This is an absolute exemption and there is therefore no requirement for TfGM to consider the public interest.

In order to respond to your requests we estimate that it will take us in excess of 300 hours to determine the appropriate material and locate, retrieve and extract the information in reference. Therefore, your request will not be processed further.

If there is a specific topic you are looking in relation to the meeting minutes and emails, please let us know and we can reassess the practicality of responding to your request.

If you are not satisfied with the response in this letter you may ask for an internal review. If you would like an internal review you should contact me in the first instance. My e-mail address is at the end of this letter.

If you remain dissatisfied after an internal review has been undertaken, you have a right to apply to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Office of the Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

www.informationcommissioner.gov.uk

Please remember to quote the above reference number in any future communications.

Yours sincerely

A handwritten signature in black ink that reads "N. Tetley". The signature is written in a cursive style with a horizontal line underneath the name.

Nicola Tetley

Paralegal

Email: foi@tfgm.com