



Information Compliance
Information Technology

Northampton Square
London EC1V 0HB
T +44 (0)20 7040 4000
F +44 (0)20 7040 8565
www.city.ac.uk

Ms Gloria Smythe

Correspondence via e-mail to: request-411966-3cb3187f@whatdotheyknow.com

4th June 2017

Dear Ms Smythe,

Freedom of Information Act Request 2017/134

Thank you for your email dated 13th June 2017 requesting information about City, University of London, made in accordance with the Freedom of Information Act 2000.

I can confirm that City, University of London holds some information that falls within the description specified in your request and where appropriate we have provided the information attached or explained why we have not disclosed the information. For ease of reference, your questions are reproduced below in bold followed by our responses.

I am writing to you to under FOI to establish your state of readiness for GDPR.

To this end I would be grateful if you could supply me with any of the following information that you may hold in connection with your GDPR compliance program

1. Data Mapping

a. Copies of the tools used to capture data for the personal data mapping exercise (e.g. questionnaires/spreadsheets etc.).

I can confirm that, City, University of London holds information that falls within the description specified in your request. However, we have withheld disclosure of questionnaires, and data flow maps under Section 43 (2) (Commercial Interests) of the Freedom of Information Act. We consider this information to be commercially sensitive and that disclosure may harm City's commercial interests. Section 43 (2) is a qualified exemption and so subject to the public interest test which follows.

We recognise that it is in the general public interest for City, University of London to publish as much information as possible about how risks associated with City are managed. This could increase public understanding and trust in City's decisions. However, the higher education sector is competitive in respect of attracting students, recruiting and retaining academic staff and developing new funding opportunities or revenue streams often in partnership with the private sector. We consider that disclosing questionnaires and data flow maps would harm our commercial and strategic interests. City, University of London must be able to protect commercially sensitive information where disclosure would allow its competitors to undermine

its commercial interests. Having considered the public interest test, we feel that the public interest lies in favour of withholding the information requested.

However, please find attached document 1, the following fields below were used to capture data:

ID Number, Asset Name, Business Area, Location, Class of Information, Highest Content Class, Risk rating before, Risk Identified, Risk Mitigations, Risk rating after, Asset Owner, Retention, Description and Notes and Title.

b. The records of processing activities and data flow maps/diagrams and any other products/outputs of the data mapping exercise.

Please find attached documents 1 and 2.

2. Gap Analysis

a. Copies of any tools used to assess any shortfall or gaps in processing vis a vis GDPR.

Following a search of our records, I have established that the information you requested is not held by City.

b. The gap analysis report and any other products/outputs of the gap analysis exercise.

The information you requested is not held by City.

3. Project Plan

a. A copy of your GDPR project Plan and Gantt chart or equivalent.

Please find attached document 3.

b. Any formal reports (be that to management, your IG steering group and senior GDPR oversight group or equivalent and Committee/Executive) on GDPR.

Please find attached document 2.

4. Outsourcing

a. Copies of updated standard GDPR compliant contracts and written instructions for processing.

Following a search of our records, I have established that the information you requested is not held by City.

5. Solutions

a. Details of other potential processing solutions devised or identified either by Essex or in collaboration with other partners.

Following a search of our records, I have established that the information you requested is not held by City.

If you are dissatisfied with the way your request for information has been managed, please contact the Director of Information Technology at:

By Post Director of Information Technology
City, University of London

By Telephone Northampton Square
 London EC1V 0HB
By Email 0207 040 4000
 foi@city.ac.uk

Please do so in writing, describe the original request, explain your grounds for dissatisfaction and include an address for correspondence.

If after contacting City, University of London you are still dissatisfied with the outcome, you have a right of appeal to the Information Commissioner:

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

By Telephone 01625 545700
Website www.ico.org.uk/

Yours sincerely,

Saidu Sesay
Information Compliance Officer