



Information Policy & Compliance  
[bbc.co.uk/foi](http://bbc.co.uk/foi)

Mr D Smith via email  
[request-135737-17a58d65@whatdotheyknow.com](mailto:request-135737-17a58d65@whatdotheyknow.com)

26<sup>th</sup> November 2012

Dear Mr Smith

### **Freedom of Information Request - RFI20121180**

Thank you for your request under the Freedom of Information Act 2000 (the Act) received on 29<sup>th</sup> October, seeking the following information:

*Does the BBC maintain a register of BBC employees' interests? If so does it include interests in private sector companies bidding for healthcare provision funded by the NHS? If such a register exists, can I have access to it please?*

All BBC employees are required to complete a Declaration of Personal Interests (DOPI) form when they join the BBC and are explicitly reminded to review their interests annually and each time they take up a new job within the BBC. In addition to this, they are obligated to update their DOPI should their interests change in the meantime.

For information, the BBC's Declaration of Personal Interests Policy can be found at the following address (please refer to Section 6 in particular):

[http://downloads.bbc.co.uk/foi/classes/policies\\_procedures/declaration\\_personal\\_interests.pdf](http://downloads.bbc.co.uk/foi/classes/policies_procedures/declaration_personal_interests.pdf)

There is no central register held of declarations of personal interests for staff within the BBC. This information would only be available from DOPI forms held on individual personnel files and we would therefore need to examine every retained personnel file for every individual check whether they have submitted a Declaration of Personal Interests form. As the BBC currently has approx. 20,000 employees we estimate that to carry out this search would take more than the appropriate limit of two and a half days. Under section 12 of the Act, we are allowed to refuse to handle the request if it would exceed this 'appropriate limit'. This limit has been set by the Regulations (SI 2004/3244) as being £450 (equivalent to two and a half days work, at an hourly rate of £25).

We are mindful of our duty under section 16 of the Act to provide reasonable advice and assistance to you, and specifically to advise how you might narrow your request so that it complies with the time limit. We are however concerned that, because of the way the BBC holds the information that you request, it is not possible to suggest any meaningful way of narrowing. For example, even if the search were to be narrowed to a single Division, the amount of information that would need to be searched would still be very large.

I hope this response satisfies your request.

### **Appeal Rights**

If you are not satisfied that we have complied with the Act in responding to your request, 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

Karen Wood  
BBC People

