

04/07/17

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Dear Mr Killock

**Freedom of Information Act 2000 (FOIA) – Outcome of Internal Review**

Thank you for your request dated 16<sup>th</sup> June 2017 which asked the University to conduct an Internal Review of your previous Freedom of Information request in which you asked for:

- (1) your policy or policy guidance for duties under the Counter-Terrorism and Security Act 2015 duties for the various local authorities listed in Schedule 6, known as “Prevent”;
- (2) your policy relating to Internet filtering, blocking and prevention of access to material deemed inappropriate;
- (3) the name of any providers of Internet filtering and blocking services that you use, or else a statement that you do not block or filter content at all;
- (4) a list of agreements, arrangements or Memorandums of Understanding between yourselves and bodies such as the Internet Watch Foundation (IWF), the Counter Terrorism Internet Referral Unit (CTIRU) of the Metropolitan Police Service (MPS), or Police Intellectual Property Crime Unit (PIPCU) of the City of London Police, to receive lists of illegal or illicit content, for instance for the purposes of blocking.
- (5) tell me if any filtering or blocking service that you use incorporates lists from the IWF, CTIRU or PIPCU, and which lists are incorporated; and
- (6) provide to me any clauses within any contract or terms and conditions of service agreed with your filtering and blocking providers that relate to their use of information from the IWF, CTIRU or PIPCU.

The purpose of an Internal Review is to assess how your Freedom of Information request was handled in the first instance and to determine whether the original decision given to you was correct. This was an independent review; I was not involved in the original decision.

I have reassessed your case and after careful consideration I have concluded that the initial response that was sent to you was fully compliant with the requirements of the FOIA. An explanation of my decision follows.

Your original request was submitted on 14 May 2017 and the response was issued on 26<sup>th</sup> May 2017. The response stated that the request was considered under the Freedom of Information Act 2000 (FOIA) and provided answers in respect of questions 1, 2 and 3. However, the University

applied Section 31 (1)(a) of the Freedom of Information Act to questions 4, 5 and 6, as this exempts information if its disclosure would be likely to prejudice the prevention of detection of a crime.

In communicating this decision, the Information Governance Team outlined the arguments in favour of disclosing the information and highlighted the public interest in understanding how public money is spent on the prevention of the illicit use of the internet at Sheffield Hall, the strength or adequacy of the University's cyber security arrangements, and the public interest in the University's implementation of the Prevent Duty.

In considering the arguments against disclosure, the Information Governance Team identified the risks around managing the Prevent Duty for the safety and security of students, the monitoring of this duty by HEFCE, the public interest in maintaining effective and robust technical and organisational controls, and in reducing opportunity for crime and preventing or reducing the risk of cyber attack.

On balance, and after my independent review of the arguments for and against the disclosure of this information, I support the University's original decision to withhold this part of your request under Section 31(1) of the Freedom of Information Act 2000.

You have the right to appeal our decision if you think it is incorrect. Details can be found in the 'How to Appeal' section attached at the end of this letter.

The published information is categorised by subject area and in alphabetical order.

Yours sincerely



Martin Conway  
University Secretary and Clerk to the Board



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## **How to Appeal**

### **Information Commissioner's Office**

If you remain dissatisfied after an internal review decision, you have the right to apply to the Information Commissioner's Office. The Commissioner is an independent regulator who has the power to direct us to respond to your request differently, if he considers that we have handled it incorrectly.

You can contact the Information Commissioner's Office at the following address:

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

Internet address: [https://www.ico.org.uk/Global/contact\\_us](https://www.ico.org.uk/Global/contact_us)