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18<sup>th</sup> August 2022

[request-845816-6323f92b@whatdotheyknow.com](mailto:request-845816-6323f92b@whatdotheyknow.com)

Tel: 0300 123 0999  
[www.secamb.nhs.uk](http://www.secamb.nhs.uk)

Dear Robert,

I am writing in response to your enquiry under the Freedom of Information Act 2000 (FOIA) reference FOI 220325 and your further communication received on the 8 August 2022 requesting an internal review.

According to our records your original FOI Request was received on the 21 March 2022. As per process this was forwarded to the relevant portfolio for review and response. On the 21 April 2022 a breach notification email was sent acknowledging the delay and confirming that we were dealing with the request.

I note that you sent further emails on the 17 July 2022 and 8 August 2022 requesting this information. Your communication of the 8 August 2022 also requested an internal review.

Firstly, please accept my sincere apologies for not completing your request within the statutory 20-day timeframe. Whilst the Trust is well versed with its statutory obligations in relation to FOI's it accepts that in this instance this has not been met.

Please be assured that this shortfall will be formally noted through the Trusts operational Information Governance Working Group. This group has representation by the Senior Information Risk Owner (SIRO), Deputy SIRO, Caldicott Guardian and senior managers within its operational and corporate functions.

**You requested the following information, please also see our response below:**

*I would like to request a copy of your list of Public Access Defibrillators. For each AED, I would like any/all of the following information that is recorded in your systems: reference number, site name / location description / address / place, full postcode, lat/lon or grid reference coordinates, owner / operator (if not a natural person).*

*I do NOT wish to know any access codes required to open cabinets. I have a strong preference for receiving this information in a re-usable electronic format, e.g. a CSV file (preferred) or an Excel spreadsheet.*

*I note two previous FOI requests for this information. In 2019, you provided this information at [https://www.whatdotheyknow.com/request/defib\\_locations\\_2](https://www.whatdotheyknow.com/request/defib_locations_2) . But in 2022 you refused it at [https://www.whatdotheyknow.com/request/public\\_access\\_defibrillator\\_loca\\_10](https://www.whatdotheyknow.com/request/public_access_defibrillator_loca_10) .*

*In relation to the 2022 refusal, I would note that all the "private" AEDs that I checked in the 2019 release appeared to be owned by businesses or organisations, rather than individuals. This means that the information about them is certainly not personal information. Moreover, even if an AED was owned by an individual, the location details would provide no additional information about the owner or provide any way to identify them. For Public Access Defibrillators, the AED will be on display to the public, so by providing the information, you would be adding nothing that is not already in the public domain. Even if any of the information was personal information, you could rely on Legitimate Interests to justify processing it for FOIA purposes, on the grounds that you want to increase public awareness of AED locations in order to save lives in the future.*

*Finally, in your responses to the 2022 request, you appear not to have complied with s17(1) of the Freedom of Information Act, since you have not explicitly stated the FOIA exemptions that you are relying on to withhold some of the information. If you do withhold any of the information I have requested, please make sure you clearly state which exemptions you are relying on, and the reasons that they hold. You may find it useful to consult the guidance from the Information Commissioner on the s40 exemption at <https://ico.org.uk/media/for-organisations/documents/2614720/personal-information-section-40-and-regulation-13-version-21.pdf> .*

### **Trust response:**

Please see the attached spreadsheet for the Defibs that are *currently registered* on our Computer Aided Dispatch System (CAD).

For information, the Trust has now joined BHF Circuit, National Defibrillator Network, with a go live date of the 23 March 2022. As part of the project remit a complete master spreadsheet of SECamb registered PAD sites was provided. Whilst SECamb has registered its own Defibs with the Circuit we cannot confirm that all private parties have done the same.

The spreadsheet attached relates to the defibs which remained unregistered following the marketing campaign facilitated by the BHF during the period 11 April 2022 until 13 July 2022.

All other defibs in our areas of operations owned by us or private parties who are registered on the Circuit and can be found by the link below.

[Defib finder – find the defibrillators nearest you.](#)

In the spirit of being open and transparent I have provided below contact details for the Information Commissioners Office (ICO) should you wish to formally complain.

As you will be aware the ICO are the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

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

<https://ico.org.uk/global/contact-us/>

Once again, please accept my sincere apologies for our delayed response. If I can assist further, then please do not hesitate in contacting me at the email address below.

[FOI@secamb.nhs.uk](mailto:FOI@secamb.nhs.uk)

Yours sincerely

**Caroline Smart**  
**Head of Information Governance / Data Protection Officer**  
**South East Coast Ambulance Service NHS Foundation Trust**