Staff Information

# Sift Manual

### **Sifting Manual**

Section A: Initial Sifting Process Searching Frequent complainants Copying and pasting Closing cases	2 3 3 4
Section B: Modifying the case Case type Case team owner Case title New process	5 5 6 7
Section C: Adding Notes Adding notes Adding file notes	8 8
Section D: Useful email address	
Section E: Setting up a CMEH complaint case from an ICE enquiry	9
Appendix 1 Case specific instructions	11
Appendix 2 Case references	14
Appendix 3 Sector groups	15
Appendix 4 Sector categories	15
Appendix 5 Party naming conventions	17
Appendix 6 Sift work flow	19

#### **Section A: Initial sifting process**

#### Sift queues 1, 2, 3 and 5

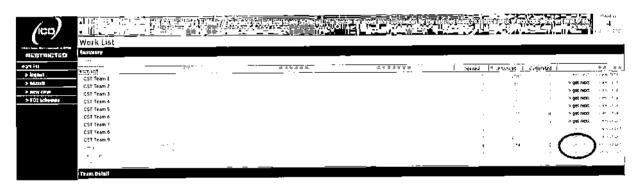
Open up two sessions of CMEH from ICON. On one CMEH click 'get next' from Sift 1, 2 or 3.

Sift 1 queue contains all the scanned postal cases. This means there could be any type of new case in this queue.

Sift 2 queue contains all the emailed concerns. This means these cases are all going to be allocated to the Improvement Performance teams to work on.

Sift 3 queue contains all the emailed advice cases that aren't misdirected. This means these cases are all going to be allocated to work queue 2.

Sift 5 queue contains all the personal security data breaches that are reported by data controllers. They are worked on by the PDB team.

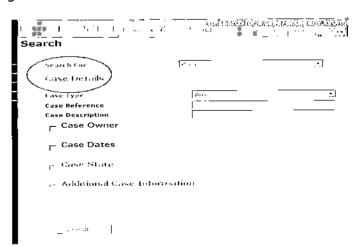


Read through the documents to understand the case. Then search for any existing/duplicate cases using the other CMEH:

you can search for the case number using the 'case reference' box;

to search under the party names use the 'case description' box; and

these searches can also include the date by clicking onto the 'Case Dates' box.



Document searches can be made by selecting document in the 'search for' box. Please ensure that the information is put into the 'body contains' box.

Party searches can be made by selecting party in the 'search for' box. Party addresses, postcodes and emails can also be searched for using the 'party contact information' box. This may help when locating a case where you can't trace the case by name.

Searches should be made both including and excluding the @info part of the address because it may give different results.

When searching only use the left hand side (as you look at the computer) searches on CMEH. Don't use the searches on the right hand side (as you look at the computer) of CMEH called 'party details' as this doesn't work.

#### Frequent complainants spread sheet

Once you have searched for the case you will need to check the 'cases for complainant's spreadsheet', for individuals who frequently send correspondence. If the case appears on the 'cases for complainants spread sheet'; copy and paste the documents into the related case, then complete and close as 'pasted into existing case'. To access the spread sheet go to 1.14.16.22 in your Meridio file plan via Outlook, this can be pasted to your Outlook workspace for ease. It is also in the casework section of ASK.

#### How to copy and paste documents into cases:

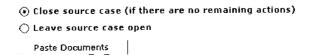
Once you have found the related case you need to copy the document to it, click 'select all' and then 'copy' on the 'case summary' page.



On the 'copy documents' page enter the case reference number for the case you want to copy the document to. Then press 'search'. The search will find the case you intend to copy the documents to. To select this case press the '>go' button.



Then press 'paste documents'. As demonstrated below, the default option is to close the source case. During the normal sifting process you will close the case.





If a situation arises where a document needs to be copied to more than one case you will need to select the 'leave source case open' box so that the source case is left open. Once you have copied the correspondence to all the cases close the case.

The next screen will be the 'close case' page where you will need to provide information about the case closure. See the next page for advice.

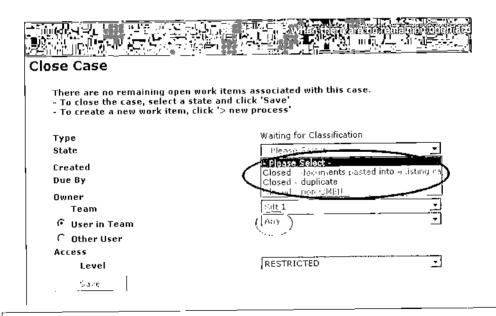
#### Closing the case:

If the case is a clear duplicate then close it as a duplicate. If the case is a spam email or a virus warning then complete with no further action close it as non-CMEH. Simply click 'complete' on the left hand side and the following page will appear:

Close the case under one of the following actions:

- 'documents pasted into existing case';
- 'duplicate'; or
- 'non CMEH'.

\_

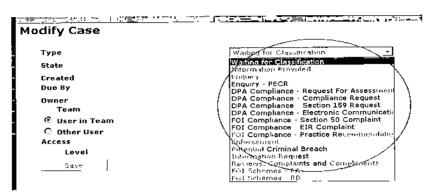


#### Points to remember:

ALWAYS keep 2 CMEH sessions open.
ALWAYS search for existing/duplicate cases
ALWAYS Check the 'cases for complainant's spread
sheet'
If in doubt – ASK!

#### Section B: Modifying the case from Sift 1, 2 or 3.

- **1.** Click 'modify' under case details. The 'modify case' page will then appear.
- 2. Select a case type under 'type' and 'team.' And click 'save.'



#### Case types:

**RFA**: Requests for Assessment. For all Data Protection concerns even if not on a form or on an FOIA form in error.

**ELE**: Electronic Communications. To be used for PECR email and fax concerns only. **This is no longer being used for new cases.** 

**ENQ** or **PEC**: For general enquiries, misdirected mail and specific PECR enquiries. If you sift an ENQ case you think may need policy advice, allocate it to yourself. If, having researched the answer on the ASK/website/other resources, you are still unable to answer the ENQ speak with your LCO. With input from Rob Cole it might be a PDARF.

**FS50**: For FOI concerns.

FER: For EIR concerns.

**COM**: Self-reported security incidents reported by a data controller (but not whistle-blowers).

**SEC:** Request made under s159 of the Consumer Credit Act but set up as an RFA in the first instance.

**PCB**: Action taken where a potential criminal breach has been identified, only used by the Investigations teams.

FPR: For Reuse of Public Sector Information Regulations (RPSI) concerns.

**INF**: Information provided: This is when information is copied to the ICO or sent to us to keep on file for future reference with no action requested. One INF case is set up per month and all copied correspondence goes into this case. The INF case number can be found on the 'case for the complainants' spread sheet or on the Advice Services Knowledgebase (ASK) noticeboard. You can access the sheet at 1.14.16.22 on Meridio or via the casework procedures in ASK.

#### **Case team owner – Advice:**

work queue 1 -

work queue 2 – written advice enquiries (including GDPR enquiries) and misdirected enquiries.

work queue 4 - MP Letters; and

Other work queues – see appendix 3.

6

#### Case team owner - the PDB team

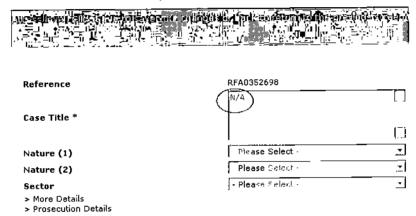
work queue 3 - self reported breaches;

Information Governance (IRQ) - ask LCO - If in doubt - ASK!

Then click 'Save'.

#### 3. Case title:

On the right hand side under 'case title' add the name of the data controller and the name of the person making the complaint.



You should use the party naming conventions to correctly format the data controller's name. See appendix 5 for the party naming conventions.

The format of the person's title should be their full name using a capital for the first letter of their first name and surname. Don't use their title such as Mr, Mrs, Miss, Ms unless only the surname is given.

If only an email address is given with no name the name must be 'Anon' and then put email address in brackets. If an individual is writing on behalf of a company or another individual their name should be entered followed by 'OBO' (on behalf of) and the company/organisation/person's name they represent, except Enforcement/PDB team cases where you just add the company name.

E.g. Tesco/Maria Clark
Walkers/Sam Pick obo Apple

After the title has been added, you will need to add the date it was received by the ICO. Please use the following format:

E.g. Tesco/Maria Clark \*10/03/2018\* Walkers/Sam Pick obo Apple \*25/03/2018\*

When sifting cases that are from more than one complainant it is essential that you add both names into the title:

E.g. Tesco/ John Smith & Jane Jones \*10/05/2018\*

When adding the parties (See section C) ensure that you add both as a 'submitted by' party. This is because if one of the parties rings in to speak about the case and they aren't in the title and added as a party then you won't find the case.

#### Recording correspondence in Welsh

We report annually on the number of Welsh language enquiries (written and telephone) we receive and want a full understanding of the demand for our services in Welsh. To help us count the number of enquiries and concerns we receive in Welsh, we should add 'Welsh language' into the case title of any Welsh language case we sift.'

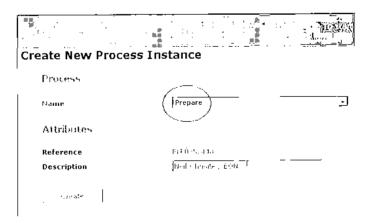
Once you have added the title select a nature from the 'nature' (1) box. Don't add these for FOIA (**FS50**). Then select a sector from the 'sector' drop down box (See Appendix 4).



For enquiries (ENQ & PEC) in work queue 2 you also have to open the more details box and tick the relevant legislation (misdirected is DPA) and choose the channel, e.g. post, email, phone.

#### 4. New Process:

Then on the left hand side click 'new process.' The following page will appear and the process should always be 'prepare.'



Once you have added the relevant information in the case description click 'create.' A new page will appear and simply click 'complete' on the left hand side of the page. If you get any advice on what to do with a case – add this advice to a note along with the name of the person who gave the advice.

#### Points to remember:

ALWAYS select a case type

ALWAYS set the case team owner

**ALWAYS** allocate work queue 2 cases to yourself

**ALWAYS** add the party details and date

ALWAYS add the nature, sector, channel & Legislation

#### **Case changes:**

A case change may come back into your personal queue. All case changes must be completed within 5 working days in line with our service standards. If in doubt of what action to take please ask an LCO.

#### **Section C: Adding Notes.**

#### **Adding Notes**

Notes should be added for any contact by telephone or face to face with the party. To add a note:

- · click 'notes' on the navigation bar; and
- enter the text you wish in the add note box and click the add note button.

**Note:** There is no facility to delete notes so be very careful what you add. They are also limited in the number of characters you can add. If it is a long telephone note you may consider adding a file note in the documents within the case instead.

#### 2. Adding file notes

To add a file note:

- click new document, file notes, generate;
- enter the text in the opened Microsoft word document;
- click save changes and rename the file in the document title field; and
- click update and the file note will be added to the case documents.

#### **Section D: Useful Email Addresses:**

Email address	When used
accessicoinformation@ico.org.uk	FOI /SAR requests made to the
	ICO

# Section E: Setting up a CMEH complaint case from an ICE enquiry

If an individual responds to an enquiry in ICE wishing to make a complaint about an organisation (and supplies relevant evidence) a CMFH case should be created.

To set up a complaint case on CMEH and transfer the documents received on ICE to CMEH you will need to:

#### Set up a CMEH case:

- Conduct a search on CMEH to determine there are no duplicate cases.
- If there are no duplicates, select **new case** from menu.
- Select the correct complaint type from the drop down menu (See page 5 for **case types and appendix 2**).
- Select the correct work queue.
   (See Sift Desk Quick Reference Aid & IP teams)
- User in team should remain as any.
- Create a case title.
   (See section 3 case title. Page 6)
- Select nature of complaint from the drop down menu.
   (See GDPR list of natures)
- Select the sector of the DC being complained about from the drop down menu. (See appendix 4)
- Tick the 'pathfinder' box under the more details section.
- Select **new process** from the menu and **prepare** from the dropdown menu.
- Select create.

#### Transfer the documents to the new case:

- Send an email to your team's **ICE rep\*** and **CC** including the following information:
  - Subject: "Request for document transfer from (ice ref) to [Ref. (CMEH ref)]".
  - CMEH case ref:
  - o ICE case ref:
  - o Email address of customer:
  - Date and time of email/s rec'd:
  - Subject line of email/s:
- Add a party to the CMEH case.
  - Use any existing matching party reference number.
  - o Create a new party reference should none exist.
- Send an acknowledgment to the complainant.
  - Select new document.
  - Select email.

- Use the <u>Complaint Acknowledgement Template</u> adding the ICE reference number and CMEH reference number.
- Title "Response from Information Commissioner's Office"
- o Check email address is correct before clicking **send**.
- Add a **note to CMEH** case confirming you have undertaken the security check.
- Add a **note to ICE** case to confirm CMEH case has been created and acknowledged.

#### \*Team rep's:

Aimee Smith – Jenny's team Caitlin Muir – Danny's team Martyn Boaler – Dan's team Robin Gennery – Judith's team Sarah Delahunty – Jane's team

Any cases relating to political	Put 'POC' at beginning of case title. (e.g. POC - name *Date*)	11
ca <u>mpaigni</u> ng GDPR	Put 'GDPR' at beginning of case title and put into WQ1. If the case has a telephone number please mark as PTC but ensure you do so after GDPR. (e.g. GDPR PTC name *Date*)	
GDPR/DPA18 Complaint	Select 'RFA' and put into relevant work queue. 'Path Finder' attribute under 'More Details' should be ticked.	
	In order to populate the 'Nature' please see Annex 6 below.	
Request for co- operation from other data protection authorities	should be forwarded to IH	These requests should be forwarded to IH from the inbox so there shouldn't me many in CMEH.
Any ENQ's received relating to Brexit.	Put 'Brexit' at beginning of case title and put into WQ2. If the case has a telephone number please mark as PTC but ensure you do so after Brexit. (e.g. Brexit PTC name *Date*)	
ENQ's requiring advice from Policy and Engagement Public Services team.	Set up as ENQ in WQ2 and self- allocate. From the case, email  @ico.orq.uk with your request for advice (include your name and direct dial on the email). Leave the case in your queue whilst you await a response.	The team will aim to respond to your request within five working days. I you have not heard anything within that time send a chaser to team.
cases relating to the use of facial recognition technology	Please put 'FRT' at the beginning of the case title. If the case is an RFA mark them as high priority and put them in WQ6. If the case is an ENQ and has a telephone number please mark as PTC but ensure you do so after FRT. (e.g. FRT - PTC name *Date*)	
Correspondence received from organisations requesting consultation on their DPIA's	If you identify a request for consultation on a DPIA from an organisation within the Inbox, Sift or Casework this should be forwarded to dpiaconsultation@ico.org.uk. If you are not sure please consult an LCO.	
Cases where we receive a standard letter requesting us to stop sharing	Please put 'notice to ICO' at the beginning of each case title and put them into WQ2. If the case has a telephone number please mark as PTC but ensure you do so after 'notice to ICO'. (e.g. notice to ICO - PTC -	

information with credit organisations	name *Date*)	
Misdirected	Work queue 2 Add misdirected to the title. (Misdirected – Name *Date*) Self-allocate the case.	ENQ – anything not covered by the ICO legislation but aimed at some other organisation.
Non notification	Create RFA and assign to sector team.	
Information Requests	Forward the information request to accessicoinformation@ico.org.uk. DO NOT set up an IRQ case.	Check with your LCO first
Hybrid cases	This is where there is personal information that can't be separated from FOIA Set up an RFA and FS50 case and link the cases on CMEH.	Make sure that there is a note of each case quoting the other reference numbers(s) in addition to linking cases.
Case Splitting	If an individual is raising a concern about numerous data controllers a separate case needs to be created for each data controller.	Make a note on each case quoting the other reference number(s).
Virus Alert	Close non CMEH	DO NOT OPEN!
Publication Scheme	Section 19 FOIA – enquiries work queue 2	
Can't find case	Speak to LCO	
Failure Notice	Look for a case reference number in it and paste it into that case.	If there isn't an existing case/no case officer – speak to an LCO
Legal notice/Letters before claim/action	Speak to LCO	LCO will email  wico.org.uk for an opinion. Valid Letters before claim/action require a response in 14 days
Security breach process	Red flagged at inbox stage and PDB team will deal with from then on.	If you pick such a case up in Sift 1, 2 or 3 set them up as a 'COM' case, allocate them to WQ3, add the data controller name and date to the case title. Ensure if it is a breach under GDPR/DPA18 that the 'Path Finder' attribute under 'More Details' is ticked. Then prepare the case through to WQ3.
		Send an email to -

		let them know you have done this. The PDB team will pick it up from there.
Section 170 (DPA 18)	Data Controller alleging an offence under s170 (within their own org).	See 's170 Sift procedure' document (ASK>casework procedures)
	Postal Correspondence: COM Case. Work Queue 3 Title "PS170 Data Controller *Date* Tick 'pathfinder' box	
	Email correspondence: Forward details of sift case to  @ico.org.uk	
Section 77 FOIA	Relevant sector team queue and email LCO	
Escalation Requests	Attach request onto the case. Email relevant team manager/LCO.	See "Sift Desk Aid & IP teams" document for relevant details. (casework procedures)
RCC, complaints about a case.	Attach to the case.	The case officer should set up RCC.  If no case officer email team manager and place a copy of this email onto the case.
RCC complaint about the service (helpline or livechat) Request for forms/leaflets	Allocate to manager in Advice Service  – If unsure which manager to allocate the case to please speak to your manager in the first instance.  Deal with through Granby or directly.	Email the manager to inform that you have created an RCC in the queue.
Unzips	Little Fish	Email @ico.org.uk
Change of contact details 'Receiving mail at your address for another individual'	Send to relevant team LCO  Set up as an RFA – principle 4 issue – and assign to relevant work queue.  Ensure if it is a breach under GDPR/DPA18 that the 'Path Finder' attribute under 'More Details' is	See "Sift Desk Aid & IP teams" document for relevant details.
Welsh Language Cases	ticked.  Add 'Welsh Language' into the title box with the other parties.	http://mtganet.child.indigo.local/deputy- ceo/ECSG/Pages/Managing- communications.aspx
Construction database	Email Access ICO information team inbox. Don't email Aideen Oakes directly as she may be out of the office and then it won't be responded to.	This is the database we took as part of a criminal investigation. We are the data controller for it and answer SARs and FOIA requests on it.  (Aideen Oakes is the contact point

<u> </u>	, — — — — —	in the Access ICO information team)
Anonymous cases	Anon – add email address into the title	
First name only	Name – add email address into the title	
Northern Ireland  DPA and FOIA	Any cases involving a Northern Ireland  DC or PA should be assigned to the	
_cases	relevant sector work queue.	
Welsh DP cases	These cases should be assigned to the relevant sector work queue.	
Welsh FOI cases	Any cases for a Welsh Public Authority should be placed in the FOI – Wales queue.	
Registration cases	<ul> <li>all items that need to go to Registration need to go out of the inbox directly to the registration email address via forward;</li> <li>if you get a case in CMEH that needs to go to Registration you need to find the corresponding email in the inbox and forward it from the inbox; and</li> <li>then close the CMEH case as 'non-CMEH'.</li> <li>Please add the organisation's name or the individual's name to the subject</li> </ul>	DO NOT SEND ANYTHING OUT OF CMEH TO REGISTRATION.
Whistleblowers	title. These cases should be set up straight from the inbox and allocated to Grace Morgan or Stephanie Schofield. The case should be set up as ENQ, in WQ2 with 'Whistleblower' in the title. (e.g. Whistleblower *date*) There should not be any personal data in the title	
Wrongly sifted cases	If you find a wrongly sifted ENQ – then create a new RFA/FS50/ELE and close the ENQ as a duplicate.	Do not modify the case reference once created.
Spam email complaints	If you pick up a complaint regarding spam emails – Create an enquiry case so we can respond and direct the customer to the reporting tool on the website.	Do not create an ELE case for it.
ICO staff submitting casework in their own name	<ul> <li>If a matter is identified as relating to an ICO staff case during the sift process;</li> <li>Request the original hard copy of the information.</li> <li>Once received, delete it from CMEH, making sure only a shell case remains with no reference to the content of the case, but with 'ECS' in the title.</li> <li>Refer the CMEH case to one of the Team Managers in the Advice Service and pass over the hard copy material.</li> </ul>	
Independent Inquiry in to Child Sexual Abuse	Case reference numbers of any cases which fall within the scope of the Independent Inquiry into Sexual Abuse	The IICSA (previously known as the Goddard Inquiry) is an independent inquiry in relation to child sexual

(IICCA)	word to be cont to Access ICO	
(IICSA)	need to be sent to Access ICO information team, copying the email to	abuse.
Formerly the	the case so that the case officer who	Ask LCO if not sure.
Goddard Inquiry	picks it up is aware that Access ICO information team has been notified.	Email – <u>@íco.org.uk</u>
	Case title - "PRESERVED - IICSA. DC / DS *date*	Include "PRESERVED – IICSA" at start of case title.
GP's submitting SARs to the PCSE regarding pensions	Cases should be sifted against NHS England not PCSE.	There has been a number of cases recently whereby Doctors have submitted SAR for information
DDCI (Dougo of	NHS England / Doctor's name *date* When we receive a RPSI concern it	regarding their pensions.  When you have sifted a case into
RPSI (Reuse of Public Sector Information)	should be set up as 'FOI Compliance – Practice Recommendation' (FPR) and	work queue 2 send an email to a LCO to inform them.
regulations cases	Case Officer sifting will email an LCO who will manually put the case into the 'DPA	See 'Reuse of public sector information (RPSI) case – procedure information'
	RAD Audit Queue'. Case officer in PID will be assigned the case and record the relevant details.	(casework procedures)
Concerns about use of domestic CCTV by an	Set up an RFA. Work Queue 5 Allocated to Karen Shann	We do not require any evidence from the complainant. This is because any evidence is often
individual	Sift tag – 'Rynes' (e.g. Rynes – complained about / complainant *date*)	inadequate and doesn't prove anything. Complainants are not asked to raise a concern in writing before bringing it to us.
Enquiries about domestic CCTV	Work queue 2 Sift tag – 'Rynes' (e.g. Rynes – Name *date*)	
Enquiries about UK Data Protection Bill	title	
How to complain	(e.g. UK DP Bill – <u>Name *date*)</u> Work queue 1	These are cases where the intention
enquiry cases	Sift tag – 'HTC' (e.g. HTC – Name *date*)	of the customer is to complain but there is insufficient information to create a complaint.
BCR applications	A new email address for BCR applications has been created and updated on the ICO website: <a href="https://ico.org.uk/for-organisations/guide-to-data-protection/binding-corporate-rules/">https://ico.org.uk/for-organisations/guide-to-data-protection/binding-corporate-rules/</a>	The email address to organisations who want to contact us about BCRs: bcr@ico.org.uk
International notifications from Data Controllers	Refer this to the BCR Team – BCR@ico.org.uk	If identified at Inbox stage please refer directly to the BCR Team.
		If identified in CMEH refer to the BCR Team and close the case/sift as 'Non CMEH'
Use of ICO logo	Refer to @ico.org.uk	Close non CMEH
	- <u> </u>	l l

Gender recognition cases	Any case involving an issue relating to a Gender Recognition Certificate are taken off the electronic system and handled separately.	If in doubt speak to Aimee Smith or in the first instance.
	The documents should be printed and passed to Aimee Smith or All electronic documents should be deleted from the sift item and the case closed non-CMEH.	
Section 159 of the Consumer Credit Act	Request made under s159 of the Consumer Credit Act but set up as an RFA in the first instance. Add "S.159 CCA" to case title.	
MPs and elected representatives correspondence	All MPs enquiries should be set up as an ENQ. Name the case, including the name of the ER, date of receipt and a brief description of the subject (example; 'John Smith MP obo*01/01/2014* - Credit Reference Agencies'). Allocate the case to WQ4.	Email AS Elected Members Inbox to inform them when you have created a new case.
MPs and elected representatives cases	Where an MP is bringing a case to the ICO on behalf of their constituents these cases should be set up through the normal procedure. Follow the same procedure when an elected representative raises their own complaint.	Email the relevant Team Managers in complaints and the Group Managers in FOI to make them aware of the case.
PHSO Correspondence	Any correspondence from the PHSO that relates to how we have handled a case should be sent to the PHSO Complaints inbox from the casework inbox:  @ico.org.uk	If there is an existing PHSO case for the complaint, (which will be labelled: PHSO Case (SURNAME) *dd/mm/yyyy*) please copy the correspondence to there.
	If this correspondence has been received using Egress, forward it to @ico.org.uk	
Complaints regarding Police, Justice and Surveillance priority cases.	Policy have a number of active cases they are investigating (available on ICON)  Any correspondence to these case should be flagged	References for all RFAs relating to Police, Justice and Surveillance priority cases (list on ASK) to be sent to DP C&R team managers (Dominic Smith, Maureen White and George Serjeant) cc Bethan Salmon and Patrick Kiernan'.
Northern Ireland Government departments	The 9 Northern Ireland government departments are:  The Executive Office (formerly Office of	From 10 May 2016, the number of Northern Ireland government departments reduced from 12 to nine. The functions and services
	First and Deputy First Minister)  Department of Agriculture,  Environment & Rural Affairs (formerly)	delivered by the 12 former departments have been restructured and transferred to the
	Department of Agriculture and Rural Development)  Department for Infrastructure  (formerly Department for Regional	relevant new department. Please note that any complaints made against the old departments should be recorded under the name of the

Development)

Department for the Economy

(formerly Department for Employment & Learning)

Department of Education

Department of Finance (formerly Department of Finance & Personnel)

Department of Health (formerly Department of Health, Social Services & Public Safety)

Department of Justice

Department for Communities

(formerly Department for Social Development)

relevant new department.

The functions of the former departments of Culture, Arts & Leisure; the Environment; Enterprise, Trade & Investment have been transferred amongst the nine new departments.

### **Appendix 2: Case References**

Case Reason	
reference	<u> </u>
RFA Request for	assessment. This comes from section 42 of
the DPA. It	is the ICO's responsibility to decide if an
	is likely or unlikely to be compliant with the
principles of	the DPA.
INF Information	provided. This is when information is
copied to the	E ICO or sent to us to keep on file for future
reference wi	th no action requested at this moment in
time. We cr	eate one case per month for all copied
corresponde	nce to be copied onto. The reference
number for	his is on the cases for complainants' spread
	4.16.22, on ASK or the notice board.
	a DPA, FOIA, EIR, GDPR or misdirected
enquiry.	
FS50 This is a cor	cern under section 50 of FOIA. This is
when a com	plainant asks the ICO to investigate whether
	d have provided the information requested
or not.	
FER This is a cor	cern under Regulation 18 of EIR. This is
when a com	plainant asks the ICO to investigate whether
	d have provided the information requested
or <u>not</u>	(CAD)
IRQ Request for	information (FOIA) and personal data (SAR)
	This goes to our Information Governance
Team	
COM Self-reporte	d security breaches reported by a data
	ut_not_whistle-blowers)
	minal Breach such as section 55 DPA or
section 77 F	OIA (see SRB procedure)
SEC Section 159	Consumer Credit Act – this is when either a
credit refere	nce agency (most likely) or individual
	k for adjudication on a notice of correction.
	n. This is a concern about unsolicited
marketing u	sing the fax or email. All PECR concern are
allocated to	the legal team queue. However any which
are not mar	keting, silent calls or non-UK data
controllers t	hese should be sent to work queue 2 as a
	oluminous PECR complainants can have
	e copy and paste onto. They can be
added to the	ne Case for Complainants spreadsheet*
This is no	onger being used for new cases.
RCC Review, Cor	nplaints and Compliments – these are cases
that are set	up when a complaint about an existing case
	ually by the case officer) or if they come in
directly.	<u> </u>
PEC This is a PE	
,	ncern about the Reuse of Public Sector
Information	Regulations

## **Appendix 3: Sector Groups**Link to <u>'Desk aid & IP teams'</u> document

#### **Appendix 4 – Sector Descriptions**

Sector on CMEH	When to use	
Accountants, ILA	Chartered accountants, Small accountants, Trustees in bankruptcy	
Audit/Inspections	Auditors	
Central Government	All Government departments, NDPB's or "Quango's"	
Granties	Charities, Voluntary organisations including Consumer Direct (CAB)	
Clubs/Associations	Small clubs, Unincorporated clubs, Membership clubs, Sports clubs, Pressure groups, Residents associations, Leisure clubs (but not leisure centres), Neighbourhood watch groups, Dating Agencies	
Courts/Justice system (For FOI use Police & criminal justice*)	All complaints about the court system (even though the MOJ will be the data controller)	
Credit reference agencies	Credit referencing & credit scoring. The way Callcredit, Experian & Equifax operate. Not to be used where the CRA has investigated an alleged inaccuracy, have not ignored compelling evidence that information is inaccurate and where the lender/debt collector is concerned has confirmed that the information is correct - these cases should be recorded under the heading lenders or debt collectors	
Dobe collectors	Companies engaged in debt collection activities, Tracing agents, Not to be used for cases concerning the in-house debt collection activities of lenders, which should be recorded under lenders.	
	General direct marketing companies, Non sector specific sales oriented call centres, Lead generation companies, PECR and where unable to identify organisation (UTIS) (i.e. where just a number is reported.)	
	Schools, Colleges, Universities, Local Education Authorities, Private tutorial companies	
	Estate agents, Surveyors (property and chartered) Property management companies, Property rental companies	
	Independent financial advisors, Tied agents, Insurance agents, Brokers, Bank of England (insurance and mortgage)	
	Small to medium enterprises, Manufacturers, Sole traders, Partnerships, Residential care companies, Private Investigators, Parking enforcement agencies. <b>If not sure take advice</b>	
	All health related institutions & medical care homes (NHS and private)	
是自己的自己的 1000 1000 1000 1000 1000 1000 1000 10	Private landlords, Social Landlords	
	Small to medium businesses where the issue relates to employment, disciplinary proceedings, dismissal or recruitment.	
	Insurance companies (household, travel, car, health, occupational health), Loss adjustors, Brokers	
Property Complete Com	ISP's, General websites, Online retailers – where not high street retailer or supermarket – see Retail	

	D. J. J. J. Bradish I
	Private run leisure centres, Gyms, Cinemas, Restaurants, English Heritage, Arts Council, Forestry Commission, National Museums, Crown Estate, Public Houses, Hotels, guest houses
	Banks, Building societies, Credit card companies, Loan companies, claim management companies.
local covernment	For all casework concerning Local Authorities except those regarding Social Services (which should be recorded under the Social Services) and Local Education Authorities (which should be recorded under the Education)
Mall order	Mail order catalogues
veda vising and the	Printed media, TV(excluding BBC and Chanel 4), Radio, Internet media
Votor thaustry	Car dealerships/showrooms, Car manufacturers, Car hire/loan
	MPs, SMP's, AM's, MEP's & Constituency offices
	Do not use take advice
Other individuals	Can be used for section 36 - domestic purposes.
Tonsions (I)	Pension and Occupational pension companies, actuaries, trustees of pension schemes, pension service providers & administrators
Policing and criminal records (For FOI use Police & criminal flustice*)	Police forces, Disclosure and Barring Service
Political parties	Labour, Conservatives, Liberals Plaid Cymru etc. (Not MP's)
	For all complaints about prisons (although the Home Office is the data controller).
	For all complaints about the Probation Service (although the MOJ will be the data controller).
THE PROPERTY OF THE PARTY OF TH	Unions
Resultation of the same of	Private employment agencies, Locum agencies
	Law Society, Financial Service Authority, Local Government Ombudsman, Parliamentary and Health Service Ombudsman, Independent Case Examiner, Ofcom, ICSTIS, Otelo
	Churches, Religious organisations that don't come under Clubs/Associations
	General retail, High Street shops, Supermarkets, Chain stores, Wholesalers
Salis in the sales	For all cases involving Social Services departments/raising social care issues.
SOUTH COLD CARE TO BE A SOUTH TO	Solicitors, Barrister, Legal advisors, Notaries
idigade	Network Operators, Service providers, Telecoms Retail
्राजिक्ष्य स्थापिक स्थ स्थापिक स्थापिक	Travel agencies/companies, Tour operators, Rail, Bus companies, Airlines, Airports, Royal Mail, Post Office

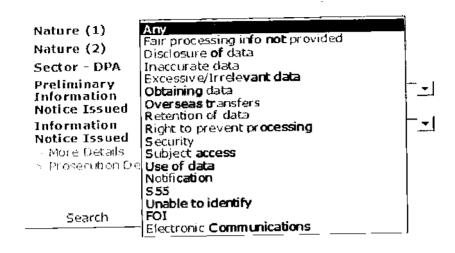
### **Appendix 5 – Party naming conventions**

Organisation type	Example organisations	Example name to be used	Convention and help
Any organisation with a 'the' at the start	The Scotland Office, The Ridings Academy School, The Liverpool Hospital	Scotland Office, Ridings Academy School, Liverpool Hospital	For any organisation with a 'the' at the start omit the 'the'
Banks	Cahoot Royal Bank of Scotland/ RBS	Cahoot Royal Bank of Scotland	For banking, use the name of the bank. The sector team will work out the banking group. Use Royal Bank of Scotland, not RBS.
Government departments and agencies, non- departmental public bodies (NDPBs) etc with accepted acronyms	Ministry of Justice, UK Borders Agency, The Information Commissioner's Office	MoJ, UKBA, ICO	Use accepted acronyms of Government departments and agencies, NDPBs etc. Other examples include DWP*, Defra, HMRC, DfE, DoH. If you're not sure if the acronym is 'accepted' or not, put the full name. There is a useful list of departments and agencies at <a href="https://www.gov.uk/government/organis-ations">https://www.gov.uk/government/organis-ations</a>
	*Department for Work and Pensions (DWP)	Branches/issues that might come up within the DWP, that need to show DWP in the title are:  Disability and Carers Service (includes Personal Independence Payments. Disability Living Allowance Carer's Allowance). Pensions Service (includes Pension Centres, Pension Tracing Service, Pension Credit, Winter Fuel Allowance). Benefit Delivery Centres (BDC). Any Job Centre or Job Centre Plus (JCP). Job Seekers Allowance (JSA). Universal Job Match (UJM) Work Capability Assessment (WCA).	When setting up cases regarding DWP and its associated services (Jobcentre Plus, Benefit Delivery Centres, Pensions Service and Disability and Carers Service) we just need to record 'DWP' in the case title.  Where we receive concerns regarding the Child Support Agency (Child Maintenance Group, CMEC etc) the case title should be recorded as 'DWP (CSA)'.  The CSA does include the brand names: Child Support Agency Child Maintenance Service And was called the Child Maintenance Enforcement Commission for a while.  Where the case relates to an Independent Case Examiner, please record as 'DWP (ICE)'.  The following are independent agencies of the DWP, but come up infrequently, each have their own ORG on CMEH (and we write to each independently): Independent Case Examiner = DWP (ICE) Health and Safety Executive = Health and Safety Executive Pensions Ombudsman Pensions Regulator
Agencies, NDPBs etc of government departments	HMCTS, UKBA, DVLA	MoJ (HMCTS), Home Office (UKBA), DfT (DVLA)	For agencies of government departments name the department with the agency in brackets.  Again there is a useful list of departments and agencies at <a href="https://www.gov.uk/government/organis">https://www.gov.uk/government/organis</a> ations
Hospitals	University Hospital of South Manchester	South Manchester (University Hospital)	For Hospitals with 'University Hospital' in the title, put this at the end.

London Borough Councils	Camden Council, Barking and Dagenham	London Borough of Camden, London Borough of Barking and Dagenham	For councils within the London Borough, use 'London Borough of' followed by the location of the council. There is a useful list of London Borough councils at <a href="https://directory.londoncouncils.gov.uk/">https://directory.londoncouncils.gov.uk/</a>
Police and Crime Commissioners	Greater Manchester Police and Crime Commissioner	PCC Greater Manchester	Use 'PCC' followed by the geographical location of the Police and Crime Commissioner/the police force they relate to.
Police forces	Essex Police, Durham Constabulary	Police (Essex), Police (Durham Constabulary)	Put 'Police' before the geographical location of the force.
Prisons	Durham Prison	HMP Durham	Put 'HMP' before the name of the prison
Safety Camera Partnerships	Avon and Somerset Safety Camera Partnership, Bedfordshire and Luton Casualty Reduction Partnership	Safety Camera (Avon & Somerset), Safety Camera (Bedfordshire & Luton Casualty Reduction)	Where it is obvious that the data controller is a safety camera partnership, put that first, with the rest of the name in brackets.
Solicitors and Barristers	Fred and Co Solicitors, Brick Court Chambers	Solicitors (Fred and Co), Barristers (Brick Court Chambers)	Where it is obvious that a data controller is a solicitors firm or barristers chambers, put 'solicitor' or 'barrister' first, with the rest of the title in brackets.
Universities	The University of Manchester The University of Sheffield	Manchester University Sheffield University	For Universities which don't already start with their geographical location, re-order as outlined.

# Appendix 6: GDPR/DPA18 natures of complaint (RFA and COM cases)

We currently measure the type of complaint using a Nature field:



As we can differentiate DPA 2018 and DPA for the COM and RFA case types using the path finder attribute we assign different meaning to the above fields (example below).

As we can't make changes to CMEH we have to use the following DPA nature states to reflect the relevant DPA 2018 infringement / complaint type.

Case Type	DPA 2018 case type	CMEH nature to be used
	Information to be provided where data collected	Fair processing info not provided
	Disclosure of data	Disclosure of data
	Accurate & up to date	Inaccurate data
RFA -	Adequate, relevant & limited	Excessive/irrelevant data
	Consent	Obtaining data
RFA	International element - inputted on IMI system	Oversees transfers

RFA	Not retained for longer than necessary	Retention of Data
RFA	Right to restrict / right to object	Right to prevent processing
RFA	Security of processing	Security
RFA	Right of access	Subject Access
RFA	Automated individual decision making / profiling	Use of Data
RFA	Right to data portability	Notification
RFA	Right to rectify	S55
RFA	Right to erasure	Unable to identify
RFA	Right to restrict	FOI
RFA	Child's consent	Electronic communications
COM	Information to be provided where data collected	Fair processing info not provided
СОМ	Disclosure of data	Disclosure of data
СОМ	Accurate & up to date	Inaccurate data
СОМ	Adequate, relevant & limited	Excessive/irrelevant data
СОМ	Consent art	Obtaining data
СОМ	International element - inputted on IMI system	Oversees transfers
СОМ	Not retained for longer than necessary	Retention of Data
СОМ	Right to restrict / right to object	Right to prevent processing
<u>COM</u>	Security of processing	Security

СОМ	Communication of breach to data subject	Subject Access
СОМ	Automated individual decision making / profiling	Use of Data
СОМ	Data Protection Officer	Notification
СОМ	Security	S55
СОМ	Criminal convictions	Unable to identify
СОМ	Special category data	FOI
СОМ	Child's consent	Electronic communications

