Herefordshire Council

Officer names & contact details: Freedom of Information requests

We frequently receive information requests asking for the names and contact details of the council's directors, councillors and the details of officers responsible for specific teams, projects or strategies. We also receive requests for copies of organisational structure charts for specific teams or directorates. We treat these enquiries as <u>Business as Usual (BAU) requests</u>.

Some information is publicly available on the council's website:

Senior management team and their contact details

Herefordshire Councillors and their contact details

The names and contact details of officers below director level are not routinely published, however, we will disclose this information as a BAU request for officers at Head of Service level and above.

In accordance with the Information Commissioner's guidance on <u>requests for the personal data of</u> <u>public authority employees</u> we consider the names / contact details of staff who are not of a level of seniority (i.e. below Head of Service level) to constitute their personal data as defined by the Data Protection Act 2018 and the UK General Data Protection Regulations and as such this information would not be disclosed under a BAU request nor would it be disclosed in a Freedom of Information (FOI) Act request. The information would be considered exempt under Section 40(2) of the FOI Act, as it consists of the personal data of third parties.

Requesting contact information for marketing purposes

We receive a lot of information requests for officer contact details from companies who want these details to send marketing information.

Although we will provide the information as set out above, it should be noted that, if you are a company intending to use the names and contact details provided to you for direct marketing, you must be registered with the Information Commissioner's Office to process personal data for this purpose. You must also check that the individual (whom you wish to contact for direct marketing purposes) is not registered with one of the preference services to prevent direct marketing. If you are you must adhere to this preference. You must also ensure you comply with the Privacy & Electronic Communication Regulations (PECR). For more information please see <u>www.ico.org.uk</u>

For the avoidance of doubt, the provision of individual names and contact details under the FOI Act or in response to BAU requests does not give consent to receive direct marketing via any media and expressly does not constitute a 'soft opt-in' under PECR.

Further information

Why not check our <u>disclosure log</u> before making a new request as your question may already have been asked and answered by a previous FOI request or information already published on our website.

Your Rights

We have considered this carefully and the council's position regarding the provision of officer names and contact details as set out above is unlikely to change without a change in the underlying law. However, if you still wish to make an FOI request for this information and you are not happy with how your response is handled you can request an internal review. If you are not satisfied with the internal review you can complain to the <u>Information Commissioner's Office</u>