12/08/2025

Our Ref: UKSBS-FOI25-26-021

Dear

Request for Review

I refer to your email of 15/07/2025, in which you requested a review of our FOI response dated 02/07/2025.

Your request for review has been assigned to me for consideration. I have now completed my review and set out my findings below.

1. “Contract Register; Regarding the section 12 exemption, I don't believe this to be valid as the retrieval of this information should not, in my opinion, take this much time.
These contracts are, by most public sector organisations, kept track of within contract registers. I don't believe that searching for the contracts that I've requested should take that long to search for and provide, as simply searching for the departments I requested in the contract register should bring up the information requested.
I would like to submit an internal review, as I don't think that it is a reasonable assessment to make, that the process of handling this request would take up to this amount of time and money.”

The complaint has not been upheld as the section 12 exemption has been confirmed to have been correctly applied. As referenced in our FOI response letter dated 02/07/2025, UKSBS does not hold a central contract register. Providing the requested extracts of UKSBS contracts will therefore require manual review of in excess of 100 contracts to source the information requested which it has been estimated will take 15 minutes per contract. This would require over 25 hours of work which is in excess of the 18 hours required for the Section 12 exemption to be applicable. The refusal notice is therefore upheld.

2.“Procurement Strategy; Please confirm the expected publication date or approximate timeframe for release.”

As referenced in our FOI response letter dated 02/07/2025 UKSBS does not currently maintain a Procurement Strategy. We are not able to provide an expected publication date or approximate timeframe for release of a UKSBS owned Procurement Strategy at this time as we do not retain this information.

3.“Contact Details; I am not requesting personally sensitive data, such as private contact details or any information that would be protected under data protection laws. I am only

UK Shared Business Services Ltd (UKSBS). Registered in England and Wales as a limited company.
Company Number 6330639. Registered Office Polaris House, North Star Avenue, Swindon, Wiltshire SN2 1FF

seeking official business contact information that would ordinarily be shared as part of professional correspondence or published in staff directories. Please share."

The complaint has not been upheld as the section 40(2) exemption has been confirmed to have been correctly applied. As referenced in our FOI response letter dated 02/07/2025 UKSBS is not required to disclose third party personal data under the FOI as this would contravene the data protection principles of the UK GDPR, specifically principle (a) of Article 5 of the UK GDPR. As established in section 3 of the Data Protection Act (DPA2018): "Personal data" means any information relating to an identified or identifiable living individual. The contact details requested have been identified as personal data under this definition. As we do not have a lawful basis for disclosing the referenced third party personal data under UK GDPR Article 6 the section 40(2) exemption has therefore been upheld.

If you are dissatisfied with the outcome of any review carried out by UKSBS following your request for information, you have a right under the Freedom of Information Act 2000 (FOI) to appeal to the independent regulator (Information Commissioner).

If you wish to do so, you must appeal to the Commissioner within six months following the date of receipt of our review decision. The Commissioner's website can be found on the following link: https://ico.org.uk/make-a-complaint/official-information-concerns-report/official-information-complaint/ or you can contact them at:

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

Call their helpline on t**elephone number:** 0303 123 1113
Fax: 01625 524510

Yours sincerely

Records Manager
Email: FOI@uksbs.co.uk

Data Protection Officer
Email: dataprotection@uksbs.co.uk

UKSBS Information Commissioner's Office Registration Number: Z1237687