

Information Rights team – Performance Summary – Quarter 1 2025/26

1. FOI:

a. Compliance:

- i. Q1 2025/26 = 74.3% (417 out of 561), Backlog (cases which are already overdue) = 53
- ii. 2024/25 = 90% (1749 out of 1951)
- iii. 2023/24 – 87% (1765 out of 2061)
- iv. 2022/23 – 84% (1460 out of 1738)
- v. 2021/22 – 76% (1315 out of 1740)
- vi. 2020/21 – 78% (893 out of 1152)

b. Number of cases received:

- i. Q1 2025-26 = 514 (monthly average 171)
- ii. 2024/25 = 2049 (monthly average 171) – 23% increase compared to 22/23
- iii. 2023/24 – 2040 (monthly average 170) – 22% increase compared to 22/23
- iv. 2022/23 – 1667 (monthly average 139)
- v. 2021/22 – 1713 (monthly average 143)
- vi. 2020/21 – 1464 (monthly average 122)

2. Children's SAR:

a. Compliance:

- i. Q1 25/26 - 40 out of 45 = 89%, Backlog (cases which are already overdue) = 4
- ii. 2024/25 - 94 out of 102 = 92%
- iii. 2023/24 – 70 cases completed, 68 on time, 97% on time
- iv. 2022/23 – 98 cases completed, 75 on time, 77% on time.
- v. 2021/22 – 77 cases completed, 34 on time, 43% on time
- vi. 2020/21 – 83 cases completed, 31 on time, 37% on time

b. Validated SARs:

- i. Q1 2025/26 – 40 – 13/month (further 48% increase)
- ii. 2024/25 – 109 – 9/month (34% increase from 23/24)
- iii. 2023/24 – 81 – 6.75/month

- iv. 2022/23 – 80 - 6.6/month.
- v. 2021/22 - 63 - 5.25/month
- vi. 2020/21 – 88 - 7.3/month.

3. Corporate SAR:

a. Annual compliance:

- i. Q1 25/26 - out 73 of 100 = 73% , Backlog (cases which are already overdue) = 38
- ii. 2024/25 - out 286 of 416 = 69%
- iii. 2023/24 – 243 cases completed, 153 on time, 63% on time
- iv. 2022/23 – 231 cases completed, 147 on time , 64% on time.
- v. 2021/22 – 144 cases completed, 77 on time, 53% on time
- vi. 2020/21 – 182 cases completed, 108 on time, 59% on time

b. Validated SARs:

- i. Q1 25/26 – 110 – 36/month
- ii. 2024/25 – 457 – 38/month – 73% increase
- iii. 2023/24 – 264 – 22/month – 16% increase
- iv. 2022/23 – 227 - 19/month.
- v. 2021/22 – 199 - 17/month
- vi. 2020/21 – 242 - 20/month.

4. Data protection:

a. Number of disclosures:

- i. Q1 25/26 = 213 (Monthly average = 71) – further 22% increase
- ii. 2024/25 – 699 (monthly = 58) – 11% increase
- iii. 2023/24 – 632 (monthly = 53)
- iv. 2022/23 – 707 (monthly = 59)
- v. 2021/22 – 425 (monthly = 35)
- vi. 2020/21 – 345 (monthly = 29)

b. Number of data breaches:

- i. Q1 25/26 = 64 (monthly 21)
- ii. 2024/25 – 280 (monthly = 23) – 17% increase
- iii. 2023/24 – 239 (monthly = 20)
- iv. 2022/23 – 260 (monthly = 22)
- v. 2021/22 – 205 (monthly = 17)
- vi. 2020/21 – 247 (monthly = 21)

c. Number of rectification cases:

- i. Q1 25/26 = 0 out of 0 completed on time = Not applicable
- ii. 2024/25 = 11 out of 13 completed on time = 85%
- iii. 2023/24 = 1 out of 1 completed on time = 100%
- iv. 2022/23 = 5 out of 5 closed on time (100%)
- v. 2021/22 = 1 out of 3 closed on time (33%)

d. Number of erasure cases:

- i. Q1 25/26 = 4 out of 4 completed on time = 100%
- ii. 2024/25 - 12 out of 13 completed on time = 92%
- iii. 2023/24 = 19 out of 21 completed on time = 90%
- iv. 2022/23 = 40 out of 44 closed on time (91%)
- v. 2021/22 = 6 out of 7 closed on time (86%)

5. Internal reviews (Stage 2):

- a. Q1 2025/26 - 22 out of 26 completed on time = 85%
- b. 2024/25 = 56 out of 70 completed on time = 80%
- c. 2023/24 = 54 out of 67 completed on time = 81%
- d. 2022/23 = 57 out of 130 completed on time – 44%

Information Rights team – Performance Summary – Quarter 2 2025/26 (Draft 7th Oct 2025)

Key challenges that we are working together as a team to manage:

- Capacity challenges within the Information Rights team due to some unforeseen circumstances, long term sickness and vacancy (our new colleague in post since September)
- Capacity challenges within the organisation resulting in non-compliance, requires disproportionate amount of chasing, services not having the time to engage with records management
- Nervousness around releasing certain information, leading to pressure on the team to agree exemptions. A cultural shift is needed towards greater confidence in sharing information and accepting managed risks. This then creates further work at stage 2 and challenges from the ICO.
- Unable to identify technological solutions that we can deploy to speed up our processes

1. FOI:

a. Compliance:

- i. April to Sept25 = 824 out of 1099 completed on time = 75%
- ii. 2024/25 = 90% (1749 out of 1951)
- iii. 2023/24 – 87% (1765 out of 2061)
- iv. 2022/23 – 84% (1460 out of 1738)
- v. 2021/22 –76% (1315 out of 1740)
- vi. 2020/21 – 78% (893 out of 1152)

b. Number of cases received:

- i. Average number of requests received/month in 2025/26 = 177
- ii. 2024/25 = 2049 (monthly average 171)
- iii. 2023/24 – 2040 (monthly average 170) – 22% increase compared to 22/23
- iv. 2022/23 – 1667 (monthly average 139)
- v. 2021/22 – 1713 (monthly average 143)
- vi. 2020/21 – 1464 (monthly average 122)

2. Children's SAR:

a. Compliance:

- i. April to Sept25 = 60 out of 69 = 87%, Unallocated case = 16
- ii. 2024/25 - 94 out of 102 = 92%
- iii. 2023/24 – 70 cases completed, 68 on time, 97% on time
- iv. 2022/23 – 98 cases completed, 75 on time , 77% on time.
- v. 2021/22 – 77 cases completed, 34 on time, 43% on time
- vi. 2020/21 – 83 cases completed, 31 on time, 37% on time

b. Validated SARs:

- i. 2025/26 – 12/month (further 33% increase)
- ii. 2024/25 – 109 – 9/month (34% increase from 23/24)
- iii. 2023/24 – 81 – 6.75/month
- iv. 2022/23 – 80 - 6.6/month.
- v. 2021/22 - 63 - 5.25/month
- vi. 2020/21 – 88 - 7.3/month.

3. Corporate SAR:

a. Annual compliance:

- i. April to Sept25 = 126 on time out of 197 = 63% Backlog (cases which are already overdue) = 39
- ii. 2024/25 - 286 on time out of 416 = 69%
- iii. 2023/24 – 243 cases completed, 153 on time, 63% on time
- iv. 2022/23 – 231 cases completed, 147 on time , 64% on time.
- v. 2021/22 – 144 cases completed, 77 on time, 53% on time
- vi. 2020/21 – 182 cases completed, 108 on time, 59% on time

b. Validated SARs:

- i. Q2 25/26 – 241 – 41/month – 8% increase from 24/25
- ii. 2024/25 – 457 – 38/month – 73% increase from 23/24
- iii. 2023/24 – 264 – 22/month – 16% increase from 22/23
- iv. 2022/23 – 227 - 19/month.

- v. 2021/22 – 199 - 17/month
- vi. 2020/21 – 242 - 20/month.

4. Data protection:

a. Number of disclosures:

- i. April to Sept 25 = 413 (Monthly average = 69) – further 19% increase
- ii. 2024/25 – 699 (monthly = 58) – 11% increase
- iii. 2023/24 – 632 (monthly = 53)
- iv. 2022/23 – 707 (monthly = 59)
- v. 2021/22 – 425 (monthly = 35)
- vi. 2020/21 – 345 (monthly = 29)

b. Number of data breaches reported:

- i. April to Sept 25 = 132 (monthly 22)
- ii. 2024/25 – 280 (monthly = 23)
- iii. 2023/24 – 239 (monthly = 20)
- iv. 2022/23 – 260 (monthly = 22)
- v. 2021/22 – 205 (monthly = 17)
- vi. 2020/21 – 247 (monthly = 21)

c. Number of rectification cases:

- i. April to Sept 25 = 1 out of 1 completed on time = 100%
- ii. 2024/25 = 11 out of 13 completed on time = 85%
- iii. 2023/24 = 1 out of 1 completed on time = 100%
- iv. 2022/23 = 5 out of 5 closed on time (100%)
- v. 2021/22 = 1 out of 3 closed on time (33%)

d. Number of erasure cases:

- i. April to Sept 25 = 10 out of 10 completed on time = 100%
- ii. 2024/25 - 12 out of 13 completed on time = 92%
- iii. 2023/24 = 19 out of 21 completed on time = 90%
- iv. 2022/23 = 40 out of 44 closed on time (91%)

v. 2021/22 = 6 out of 7 closed on time (86%)

5. Internal reviews (Stage 2):

a. Compliance

i. April to Sept 2025/26 - 40 out of 59 completed on time = 68%

ii. 2024/25 = 56 out of 70 completed on time = 80%

iii. 2023/24 = 54 out of 67 completed on time = 81%

iv. 2022/23 = 57 out of 130 completed on time – 44%

b. Number of cases completed:

i. April to Sept 2025/26 - 59 (monthly = 10) – 66% increase

ii. 2024/25 = 70 (monthly = 6)

iii. 2023/24 = 67 (monthly = 6)

Q2 FOI Figures (July 2025 - September 2025)

Doesn't reflect cases involving multiple service areas as allocation can only being assigned to one area. It is assigned to the service it was first sent to.

	Total FOI's received	FOI's that went overdue	Non Compliancy %	Compliant %
City Operations	240	30	13%	88%
Place	34	3	9%	91%
Environmental Services	42	6	14%	86%
Culture and Environment	37	8	22%	78%
Digital Innovation	8	1	13%	88%
City Infrastructure	119	12	10%	90%

	Total FOI's received	FOI's that went overdue	Non Compliancy %	Compliant %
Families Children and Wellbeing	95	31	33%	67%
Family Help and Protection	25	12	48%	52%
Commissioning and Communities	24	9	38%	63%
Education and Learning	41	10	24%	76%
Public Health	5	0	0%	100%

	Total FOI's received	FOI's that went overdue	Non Compliancy %	Compliant %
Homes and Adult Social Care	96	9	9%	91%
Adult Social Care	10	0	0%	100%
ASC Commissioning and Partnerships	3	1	33%	67%
Homes and Investment	35	1	3%	97%
Housing People Services	48	7	15%	85%

	Total FOI's received	FOI's that went overdue	Non Compliancy %	Compliant %
Central Hub Directorate	106	23	22%	78%
Cabinet Office	6	2	33%	67%
Economic Development	1	0	0%	100%
Policy and Partnerships	5	2	40%	60%
Corporate Leadership Office	0	0	0%	

Emergency Planning	0	0	0%	
Finance and Property	54	10	19%	81%
Corporate Finance and Resources	5	1	20%	80%
Corporate Procurement	6	2	33%	67%
Insurance	1	0	0%	100%
Strategic Property	11	1	9%	91%
Welfare Revenues and Business Support	31	6	19%	81%
Governance and Law	13	3	23%	77%
Democratic and Leadership Support	3	0	0%	100%
Electoral Local Land Charges and Registration Services	5	0	0%	100%
Legal Services	5	3	60%	40%
People and Innovation	33	8	24%	76%
Equalities Diversity and Inclusion	5	1	20%	80%
Facilities and Building Services	4	3	75%	25%
Human Resources	13	3	23%	77%
Innovation	9	1	11%	89%
Strategic Communications and Engagements	2	0	0%	100%

Directorate	Team	Closed but responded to Passed deadline Team in Q1&Q2	Overdue	Validated SARs Q1/2
City Ops	Planning	3		1
City Ops	Environmental Services - City Clean	2	4	4
City Ops	RS - Environmental protection	2	1	10
City Ops	Parks & Leisure (Parks)		1	1
City Ops	RS - Animal Licencing & Wardens		1	2
CLT	Directors	3	1	1
CLT	Chief Exec Office		8	6
FCW	CSWS	10	3	68
FCW	Family Help and Protection	2	1	5
FCW	Education & Learning	1	3	8
FCW	SEN	1	5	30
FCW	Disability (under 25)		2	3
FCW	Independent Visiting Service		1	1
G&L	Democratic Services	1	3	4
G&L	Electoral Services	1	2	11
G&L	Legal	1	6	13
HASC	Housing Customer Services	20	2	50
HASC	Housing Options	13	2	43
HASC	Housing - Temporary & Supported Accommodation	8	1	11
HASC	Adult Social Care	5	1	17
HASC	Adult Mental Health	1	1	3
HASC	Housing - Senior Housing	1	2	6

HASC	Housing Repairs (Council Housing)	1	2	26
HASC	Housing Strategy	1	1	1
HASC	Disability (25+)		2	4
P&F	WRBS - Council Tax	2	2	10
P&F	WRBS - Housing Benefits	1	2	3
P&F	WRBS - Revenues and Benefits	1	1	3
P&F	Audit		2	2
P&I	HR	5	12	18
P&I	Customer Feedback	1	3	14
	Housing (Complex Cases)		1	
	Unions		1	1

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Figures showing April - June 2025	City Operatio ns	Property & Finance	Homes and Adult Social Care	Families Children & Wellbeing	People and Innovation	Governanc e and Law	TOT AL	Overall percentage
Disclosed in error (Email)	5	4	7	11	2	1	30	79%
Disclosed in error (Letter)	0	0	0	1	0	0	1	3%
Data Corruption	0	0	1	0	0	0	1	3%
Lost in transit	0	0	0	0	0	0	0	0%
Lost or Stolen Hardware	0	0	0	0	0	0	0	0%
Lost or Stolen Records	0	0	1	0	0	0	1	3%
Non-Secure disposal	0	0	0	0	0	0	0	0%
Technical security failure	0	0	0	0	0	0	0	0%
Unauthorised access	0	0	0	0	0	0	0	0%
Unlawful disclosure (Published online, shared in investigation, verbally etc)	0	0	1	0	0	0	1	3%
Other	1	1	2	0	0	0	4	11%
Cyber incident	0	0	0	0	0	0	0	0%
TOTAL	6	5	12	12	2	1	38	100%
Total percentage	16%	13%	32%	32%	5%	3%		

Figures showing July - September 2025	City Operatio ns	Property & Finance	Homes and Adult Social Care	Families Children & Wellbeing	People and Innovation	Governanc e and Law	TOT AL	Overall percentage
Disclosed in error (Email)	7	1	7	9	2	3	29	73%
Disclosed in error (Letter)	0	0	1	0	0	0	1	3%
Data Corruption	1	0	0	1	0	0	2	5%
Lost in transit	1	0	0	0	0	0	1	3%
Lost or Stolen Hardware	1	0	1	0	1	0	3	8%
Lost or Stolen Records	0	0	0	1	0	0	1	3%
Non-Secure disposal	0	0	0	0	0	0	0	0%
Technical security failure	0	0	0	0	0	0	0	0%
Unauthorised access	0	0	0	0	0	0	0	0%
Unlawful disclosure (Published online, shared in investigation, verbally etc)	0	0	0	0	0	1	1	3%
Other	0	0	1	0	1	0	2	5%
Cyber incident	0	0	0	0	0	0	0	0%
TOTAL	10	1	10	11	4	4	40	100%
Total percentage	26%	3%	26%	29%	11%	11%		

Information Rights team – Performance Summary – Quarter 3 2025/26 (Draft 9th January 2026)

Key challenges that we are working together as a team to manage:

- Capacity challenges within the Information Rights team due to some unforeseen circumstances, long term sicknesses and part year vacancy
- Capacity challenges within the organisation resulting in non-compliance, requires disproportionate amount of chasing, services not having the time to work on proper records management
- Unable to identify technological solutions that we can deploy to speed up our processes – seeking help from LGA (seeking help from IT&D to enable us to run a test and learn pilot in adult social care).
- The removal of printers from key operational areas has created additional workload pressures and necessitated the use of more external resources which takes time (currently capturing implications for this to inform a business case for printer in the same room to share with IT&D)

Other points to note:

- **ICO complaints decision notice:** We have begun to receive decision notices from the ICO for non-compliance as the requests are so late going out (have received 3 decision notices)
- **Nervousness around releasing certain information:** leading to pressure on the team to agree exemptions. A cultural shift is needed towards greater confidence in sharing information and accepting managed risks. This then creates further work at stage 2 and challenges from the ICO. Has contributed to increased internal reviews (83% increase this year)
- **Internal records management processes:**
 - Offsite storage facilities do not have adequate audit trails of the records that are held which leads to us not being able to retrieve records and uncertainty that records held by the council have been disclosed in full (data loss) in line with our statutory duties. Serious data losses with corrupted records which we are unable to make clear statements in regard to telling requesters the up to date position. Inability to cross check whether corrupted records are held elsewhere.
 - The policy requiring the deletion of email accounts within 60 days of an employee's departure has exposed shortcomings in our records management practices. Email accounts as de facto repositories for official records rather than storing them within the appropriate systems. As a result, records that ought to be retained and made available for disclosure are almost certainly being deleted.

1. FOI:

a. Compliance:

- i. April to Dec25 = 1191 out of 1571 completed on time = 75.8%
- ii. 2024/25 = 90% (1749 out of 1951)
- iii. 2023/24 – 87% (1765 out of 2061)
- iv. 2022/23 – 84% (1460 out of 1738)
- v. 2021/22 –76% (1315 out of 1740)
- vi. 2020/21 – 78% (893 out of 1152)

b. Number of cases received:

- i. Average number of requests received/month in 2025/26 = 1539/9 = 171
- ii. 2024/25 = 2049 (monthly average 171)
- iii. 2023/24 – 2040 (monthly average 170) – 22% increase compared to 22/23
- iv. 2022/23 – 1667 (monthly average 139)
- v. 2021/22 – 1713 (monthly average 143)
- vi. 2020/21 – 1464 (monthly average 122)

2. Children's SAR:

a. Compliance:

- i. April to Dec25 = 88 out of 103 completed on time = 85%
- ii. Unallocated case = 16
- iii. 2024/25 - 94 out of 102 = 92%
- iv. 2023/24 – 70 cases completed, 68 on time, 97% on time
- v. 2022/23 – 98 cases completed, 75 on time , 77% on time.
- vi. 2021/22 – 77 cases completed, 34 on time, 43% on time
- vii. 2020/21 – 83 cases completed, 31 on time, 37% on time

b. Validated SARs:

- i. Average number of validated cases/month in 2025/26 (April to Dec) = 12.5/month (further 15% increase from 23/24)
- ii. 2024/25 – 109 – 9/month (33% increase from 23/24)

- iii. 2023/24 – 81 – 6.75/month
- iv. 2022/23 – 80 - 6.6/month.
- v. 2021/22 - 63 - 5.25/month
- vi. 2020/21 – 88 - 7.3/month.

3. Corporate SAR:

a. Annual compliance:

- i. April to Dec25 = 213 out of 322 completed on time = 66%. Backlog (cases which are already overdue) = 47
- ii. 2024/25 - 286 on time out of 416 = 69%
- iii. 2023/24 – 243 cases completed, 153 on time, 63% on time
- iv. 2022/23 – 231 cases completed, 147 on time , 64% on time.
- v. 2021/22 – 144 cases completed, 77 on time, 53% on time
- vi. 2020/21 – 182 cases completed, 108 on time, 59% on time

b. Validated SARs:

- i. Average number of validated cases/month in 2025/26 = 39/month
- ii. 2024/25 – 457 – 38/month – 73% increase from 23/24
- iii. 2023/24 – 264 – 22/month – 16% increase from 22/23
- iv. 2022/23 – 227 - 19/month.
- v. 2021/22 – 199 - 17/month
- vi. 2020/21 – 242 - 20/month.

4. Data protection:

a. Number of disclosures:

- i. April to Dec 25 = 640 (monthly average 71) – further 22% increase
- ii. 2024/25 – 699 (monthly = 58) – 11% increase
- iii. 2023/24 – 632 (monthly = 53)
- iv. 2022/23 – 707 (monthly = 59)
- v. 2021/22 – 425 (monthly = 35)
- vi. 2020/21 – 345 (monthly = 29)

- b. Number of data incidents reported:
 - i. April to Dec 25 = 214 incidents (of which 124 actual breaches) (monthly average 24 (14))
 - ii. 2024/25 – 280 incidents (monthly = 23)
 - iii. 2023/24 – 239 incidents (monthly = 20)
 - iv. 2022/23 – 260 incidents (monthly = 22)
 - v. 2021/22 – 205 incidents (monthly = 17)
 - vi. 2020/21 – 247 incidents (monthly = 21)

- c. Number of rectification cases:
 - i. April to Dec 25 = 4 out of 5 completed on time = 80%
 - ii. 2024/25 = 11 out of 13 completed on time = 85%
 - iii. 2023/24 = 1 out of 1 completed on time = 100%
 - iv. 2022/23 = 5 out of 5 closed on time (100%)
 - v. 2021/22 = 1 out of 3 closed on time (33%)

- d. Number of erasure cases:
 - i. April to Dec 25 = 11 out of 12 completed on time = 92%
 - ii. 2024/25 = 12 out of 13 completed on time = 92%
 - iii. 2023/24 = 19 out of 21 completed on time = 90%
 - iv. 2022/23 = 40 out of 44 closed on time (91%)
 - v. 2021/22 = 6 out of 7 closed on time (86%)

- 5. Internal reviews (Stage 2):
 - a. Compliance
 - i. April to Dec 25 = 72 out of 96 completed on time = 75%
 - ii. 2024/25 = 56 out of 70 completed on time = 80%
 - iii. 2023/24 = 54 out of 67 completed on time = 81%
 - iv. 2022/23 = 57 out of 130 completed on time – 44%

 - b. Number of cases completed:
 - i. April to December 2025/26 - 96 (monthly = 11) (83% increase)
 - ii. 2024/25 = 70 (monthly = 6)

iii. 2023/24 = 67 (monthly = 6)

Q3 FOI Figures (October 2025 - December 2025)

Doesn't reflect cases involving multiple service areas as allocation can only being assigned to one area

	Total FOI's received	FOI's that went overdue	Non Compliancy %	Compliant %
City Operations	209	43	21%	79%
Place	28	8	29%	71%
Environmental Services	26	4	15%	85%
Culture and Environment	29	10	34%	66%
Digital Innovation	8	3	38%	63%
City Infrastructure	118	18	15%	85%

	Total FOI's received	FOI's that went overdue	Non Compliancy %	Compliant %
Families Children and Wellbeing	101	32	32%	68%
Family Help and Protection	33	5	15%	85%
Commissioning and Communities	19	5	26%	74%
Education and Learning	43	21	49%	51%
Public Health	6	1	17%	83%

	Total FOI's received	FOI's that went overdue	Non Compliancy %	Compliant %
Homes and Adult Social Care	78	16	21%	79%
Adult Social Care	11	2	18%	82%
ASC Commissioning and Partnerships	5	1	20%	80%
Homes and Investment	22	6	27%	73%
Housing People Services	40	7	18%	83%

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	Total FOI's received	FOI's that went overdue	Non Compliancy %	Compliant %
Central Hub Directorate	96	20	21%	79%
Cabinet Office	1	0	0%	100%
Economic Development	0	0	0%	0%
Policy and Partnerships	1	0	0%	100%
Corporate Leadership Office	0	0	0%	
Emergency Planning	0	0	0%	
Property and Finance	51	8	16%	84%
Corporate Finance and Resources	6	1	17%	83%
Corporate Procurement	6	1	17%	83%
Insurance	2	0	0%	100%
Strategic Property	8	3	38%	63%
Welfare Revenues and Business Support	29	3	10%	90%
Governance and Law	15	3	20%	80%
Democratic and Leadership Support	7	1	14%	86%

Electoral Local Land Charges and Registration Services	4	0	0%	100%
Legal Services	4	2	50%	50%
People and Innovation	29	9	31%	69%
Equalities Diversity and Inclusion	0	0	0%	0%
Facilities and Building Services	4	0	0%	100%
Human Resources	19	6	32%	68%
Innovation	4	3	25%	75%
Strategic Communications and Engagements	2	1	50%	50%

Subject Access Review

Directorate	Service	Team	All Closed	Closed passed deadline	Compliance	Live cases (Overdue)	Live cases (In time)
Central Hub	CLT	Cabinet Office	1	1	0%	1	
Central Hub	CLT	Chief Exec Office	11	4	64%	1	1
Central Hub	CLT	Directors	4	4	0%	1	
Central Hub	G&L	Democratic Services	10	1	90%		1
Central Hub	G&L	Electoral Services	12	1	92%		
Central Hub	G&L	Legal	17	3	82%	11	
Central Hub	G&L	Life Events	1	0	100%		
Central Hub	P&F	Audit	2	1	50%		
Central Hub	P&F	Financial Services	2	1	50%		
Central Hub	P&F	Strategic Property	1	1	0%		
Central Hub	P&F	WRBS - Council Tax	5	2	60%	10	1
Central Hub	P&F	WRBS - Housing Benefits	4	1	75%		1
Central Hub	P&F	WRBS - Revenues and Benefits	2	1	50%	1	
Central Hub	P&F	Business Operations	2	0	100%		
Central Hub	P&I	Communications Team	0	0			
Central Hub	P&I	Customer Feedback	23	1	96%	1	4
Central Hub	P&I	Data Protection	0	0			
Central Hub	P&I	Equalities	3	0	100%	1	

Directorate	Service	Team	All Closed	Closed passed deadline	Compliance	Live cases (Overdue)	Live cases (In time)
Central Hub	P&I	FOI	2	0	100%		
Central Hub	P&I	Health and Safety (HR)	1	0	100%		
Central Hub	P&I	HR	15	8	47%	9	1
Central Hub	P&I	Learning and Organisational Development	0	0			1
Central Hub	P&I	SAR	4	0	100%		
City Ops	City Ops	Blue Badge	4	0	100%		1
City Ops	City Ops	Brighton Centre	3	0	100%		
City Ops	City Ops	City Development & Regeneration	3	1	67%		
City Ops	City Ops	Concessionary Travel	2	0	100%		
City Ops	City Ops	Environmental Services - City Clean	5	1	80%	2	
City Ops	City Ops	Hackney Carriage	2	0	100%		
City Ops	City Ops	IT	0	0			
City Ops	City Ops	Parking Services	8	1	88%		
City Ops	City Ops	Parking Services (CCTV)	0	0			
City Ops	City Ops	Parks & Leisure (Parks)	0	0			
City Ops	City Ops	Parks & Leisure (Sports & Leisure)	0	0			
City Ops	City Ops	Planning	4	3	25%		
City Ops	City Ops	RS - Animal Licencing & Wardens	1	1	0%		
City Ops	City Ops	RS - Environmental Health & Licensing	2	0	100%		

Directorate	Service	Team	All Closed	Closed passed deadline	Compliance	Live cases (Overdue)	Live cases (In time)
City Ops	City Ops	RS - Environmental protection	12	5	58%	1	
City Ops	City Ops	RS - ETS/ Infestations	0	0			
City Ops	City Ops	RS - Food	0	0			
City Ops	City Ops	RS - Licensing and Taxi Licensing	0	0			
FCW	FCW	BHSS	2	0	100%		
FCW	FCW	Clermont	1	1	0%		
FCW	FCW	Community Cohesion [Community Safety]	1	0	100%		
FCW	FCW	CSWS	94	17	82%	8	11
FCW	FCW	Disability (under 25)	2	2	0%	1	
FCW	FCW	Education & Learning	5	3	40%	3	1
FCW	FCW	Family Hubs & Youth	2	0	100%		1
FCW	FCW	Fostering	0	0			
FCW	FCW	Healthy lifestyles	2	0	100%		
FCW	FCW	Home to School Transport	1	1	0%		
FCW	FCW	Independent Visiting Service	0	0			
FCW	FCW	LADO	1	0	100%		
FCW	FCW	Libraries	3	1	67%		
FCW	FCW	Public Health	3	0	100%	1	
FCW	FCW	RUOK	0	0			

Directorate	Service	Team	All Closed	Closed passed deadline	Compliance	Live cases (Overdue)	Live cases (In time)
FCW	FCW	SEN	25	8	68%	3	1
FCW	FCW	Youth Offending Service	1	0	100%		
HASC	HASC	Adult Mental Health	4	1	75%		
HASC	HASC	Adult Social Care	15	6	60%	9	2
HASC	HASC	Disability (25+)	2	0	100%		
HASC	HASC	Housing - Private Sector Housing	3	2	33%		
HASC	HASC	Housing - Senior Housing	5	1	80%		1
HASC	HASC	Housing - Temporary & Supported Accommodation	0	0			
HASC	HASC	Housing Adaptations	0	0		1	
HASC	HASC	Housing Customer Services	73	23	68%	6	3
HASC	HASC	Housing Options	60	16	73%	1	2
HASC	HASC	Housing Repairs (Council Housing)	37	2	95%	2	2
HASC	HASC	Housing Strategy	0	0			
HASC	HASC	Housing Tenancy	5	0	100%		

SARs from Employees allocated to Services

Directorate	Service	Team	All Closed	Closed passed deadline	Compliance	Live Cases (Overdue)	Live Cases (In time)
Central Hub E	CLT	EMPLOYEE - Cabinet Office	1	1	0%	1	
Central Hub E	CLT	EMPLOYEE - Chief Exec Office	2	1	50%		1
Central Hub E	CLT	EMPLOYEE -Directors	1	1	0%	1	
Central Hub E	G&L	EMPLOYEE - Electoral Services	0	0			
Central Hub E	G&L	EMPLOYEE - Legal	3	1	67%	3	
Central Hub E	G&L	EMPLOYEE -Democratic Services	0	0			1
Central Hub E	P&F	EMPLOYEE - Audit	2	1	50%		
Central Hub E	P&F	EMPLOYEE - HR systems	1	0	100%	1	1
Central Hub E	P&F	EMPLOYEE - Procurement	0	0		1	
Central Hub E	P&F	EMPLOYEE - WRBS	0	0		3	
Central Hub E	P&I	EMPLOYEE - Communications Team	0	0			
Central Hub E	P&I	EMPLOYEE - Customer Feedback	1	0	100%	2	
Central Hub E	P&I	EMPLOYEE - Equalities	1	0	100%	1	
Central Hub E	P&I	EMPLOYEE - Health & Safety	1	1	0%		
Central Hub E	P&I	EMPLOYEE - Learning and Organisational Development	0	0		1	
Central Hub E	P&I	EMPLOYEE - SAR	0	0			

Directorate	Service	Team	All Closed	Closed passed deadline	Compliance	Live Cases (Overdue)	Live Cases (In time)
City Ops E	City Ops	EMPLOYEE - Blue Badge & Concessionary Travel	0	0			
City Ops E	City Ops	EMPLOYEE - Environmental Services - City Clean	2	1	50%	2	
City Ops E	City Ops	EMPLOYEE - Hackney Carraige	0	0			
City Ops E	City Ops	EMPLOYEE - IT	0	0		1	
City Ops E	City Ops	EMPLOYEE - Parks & Leisure	1	1	0%	1	
City Ops E	City Ops	EMPLOYEE - RS - Environmental Protection	0	0		1	
FCW E	FCW	EMPLOYEE - Disability (under 25)	0	0			
FCW E	FCW	EMPLOYEE - Family Help and Protection	0	0			1
FCW E	FCW	EMPLOYEE - Independent Visiting Service	0	0			
FCW E	FCW	EMPLOYEE - LADO	0	0			
FCW E	FCW	EMPLOYEE - Public Health	1	0	100%	1	
FCW E	FCW	EMPLOYEE - SEN	1	1	0%		
FCW E	FCW	EMPLOYEE - Skills and Employment	0	0			
HASC E	HASC	EMPLOYEE - Adult Mental Health	0	0			
HASC E	HASC	EMPLOYEE - Adult Social Care	1	1	0%		
HASC E	HASC	EMPLOYEE - Disability (25+)	0	0			
HASC E	HASC	EMPLOYEE - Housing	2	0	100%		

Directorate	Service	Team	All Closed	Closed passed deadline	Compliance	Live Cases (Overdue)	Live Cases (In time)
HASC E	HASC	EMPLOYEE - Housing Customer Services	1	0	100%		
HASC E	HASC	EMPLOYEE - Housing Options	1	0	100%		
HASC E	HASC	EMPLOYEE - Housing Repairs	1	0	100%		
HASC E	HASC	EMPLOYEE - Housing Strategy	0	0			
HASC E	HASC	EMPLOYEE - Housing Tenancy	1	0	100%		
HASC E	HASC	EMPLOYEE - Seniors Housing	1	1	0%		

Data breaches breakdown:

Figures showing Oct - December 2025	City Operations	Property & Finance	Homes and Adult Social Care	Families Children & Wellbeing	People and Innovation	Governance and Law	TOTAL	Overall percentage
Disclosed in error (Email)	0	2	9	14	2	0	27	66%
Disclosed in error (Letter)	1	1	3	2	0	0	7	17%
Data Corruption	0	0	0	0	0	0	0	0%
Lost in transit	0	0	0	0	0	0	0	0%
Lost or Stolen Hardware	0	0	0	0	0	0	0	0%
Lost or Stolen Records	0	0	1	0	0	0	1	2%
Non-Secure disposal	0	0	0	0	0	0	0	0%

Technical security failure	0	0	0	0	0	0	0	0%
Unauthorised access	0	0	0	0	0	0	0	0%
Unlawful disclosure (Published online, shared in investigation, verbally etc)	0	1	2	0	1	0	4	10%
Other	1	1	0	2	0	2	6	15%
Cyber incident	0	0	0	0	0	0	0	0%
TOTAL	2	5	15	18	3	2	45	110%
Total percentage	5%	13%	39%	47%	8%	5%		

Information Rights team – Performance Summary – Quarter 4 2025/26 (Draft 17th April 2026)

Key challenges that we are working together as a team to manage:

- Capacity challenges within the Information Rights team due to some unforeseen circumstances, long term sicknesses (out of 8 full time staff, 3 and out of 5 part time staff 2 so total 5 on long term sick during the year) and part year vacancy of 1 role
- Capacity challenges within the organisation resulting in non-compliance, requires disproportionate amount of chasing, services not having the time to work on proper records management (*detailed breakdown in appendix 1 and 2*)
- Complexity of the FOI and SAR cases have increased including more sophisticated correspondence using AI
- Seeking help from IT&D to enable us to run test and learn technology pilots to speed up SAR redaction + to make better use of M365 tools within adult social care
- Emails sent to a wrong person remains the biggest reason for data breaches – exploring with IT&D colleagues options to mitigate this.
- The removal of printers from our Information Rights room has created additional workload pressures as now unable to work and print at the same time adversely affecting productivity (currently capturing implications for this to inform a business case for printer in the same room)

1. FOI:

a. Compliance:

- 2025/26 = 73% (1492 out of 2052) – 76 in the backlog which are already overdue
- 2024/25 = 90% (1749 out of 1951)
- 2023/24 – 87% (1765 out of 2061)
- 2022/23 – 84% (1460 out of 1738)
- 2021/22 – 76% (1315 out of 1740)
- 2020/21 – 78% (893 out of 1152)

b. Number of cases received:

- 2025/26 = 2094 (monthly average 174)
- 2024/25 = 2049 (monthly average 171)
- 2023/24 – 2040 (monthly average 170) – 22% increase compared to 22/23
- 2022/23 – 1667 (monthly average 139)
- 2021/22 – 1713 (monthly average 143)

vi. 2020/21 – 1464 (monthly average 122)

2. Children's SAR:

a. Compliance:

- i. 2025/26 – 119 out of 142 = 84%, Unallocated cases = 9
- ii. 2024/25 - 94 out of 102 = 92%
- iii. 2023/24 – 70 cases completed, 68 on time, 97% on time
- iv. 2022/23 – 98 cases completed, 75 on time , 77% on time.
- v. 2021/22 – 77 cases completed, 34 on time, 43% on time
- vi. 2020/21 – 83 cases completed, 31 on time, 37% on time

b. Validated SARs:

- i. 2025/26 = 140 – 12/month (further 33% increase from 24/25)
- ii. 2024/25 – 109 – 9/month (33% increase from 23/24)
- iii. 2023/24 – 81 – 6.75/month
- iv. 2022/23 – 80 - 6.6/month.
- v. 2021/22 - 63 - 5.25/month
- vi. 2020/21 – 88 - 7.3/month.

3. Corporate SAR:

a. Annual compliance:

- i. 2025/26 - 272 on time out of 417 = 65% , Backlog (cases which are already overdue) = 57
- ii. 2024/25 - 286 on time out of 416 = 69%
- iii. 2023/24 – 243 cases completed, 153 on time, 63% on time
- iv. 2022/23 – 231 cases completed, 147 on time , 64% on time.
- v. 2021/22 – 144 cases completed, 77 on time, 53% on time
- vi. 2020/21 – 182 cases completed, 108 on time, 59% on time

b. Total Cases received (valid, not valid)

- i. 2025/26 – 773 – 64/month
- ii. 2024/25 – 710 – 59/month
- iii. 2023/24 – 381 – 32/month

- iv. 2022/23 – 394 - 33/month
- v. 2021/22 – 297 – 25/month
- vi. 2020/21 – 246 – 21/month

c. Validated SARs:

- i. 2025/26 – 463 – 38/month (overall SAR requests including not valid, has increased from 710 to 773)
- ii. 2024/25 – 457 – 38/month – 73% increase from 23/24
- iii. 2023/24 – 264 – 22/month – 16% increase from 22/23
- iv. 2022/23 – 227 - 19/month.
- v. 2021/22 – 199 - 17/month
- vi. 2020/21 – 242 - 20/month.

4. Data protection:

a. Number of disclosures:

- i. 2025/26 – 821 (monthly = 68) – further 17% increase from 24/25
- ii. 2024/25 – 699 (monthly = 58) – 11% increase from 23/24
- iii. 2023/24 – 632 (monthly = 53)
- iv. 2022/23 – 707 (monthly = 59)
- v. 2021/22 – 425 (monthly = 35)
- vi. 2020/21 – 345 (monthly = 29)

b. Number of data incidents reported:

- i. 2025/26 = 279 incidents (of which 165 actual breaches) (monthly average 23 (14)
- i. 2024/25 – 280 incidents (monthly = 23)
- ii. 2023/24 – 239 incidents (monthly = 20)
- iii. 2022/23 – 260 incidents (monthly = 22)
- iv. 2021/22 – 205 incidents (monthly = 17)
- v. 2020/21 – 247 incidents (monthly = 21)

c. Number of rectification cases:

- i. 2025/26 = 9 out of 9 completed on time = 100%

- ii. 2024/25 = 11 out of 13 completed on time = 85%
- iii. 2023/24 = 1 out of 1 completed on time = 100%
- iv. 2022/23 = 5 out of 5 closed on time (100%)
- v. 2021/22 = 1 out of 3 closed on time (33%)

d. Number of erasure cases:

- i. 2025/26 = 11 out of 13 completed on time = 85%
- i. 2024/25 = 12 out of 13 completed on time = 92%
- ii. 2023/24 = 19 out of 21 completed on time = 90%
- iii. 2022/23 = 40 out of 44 closed on time (91%)
- iv. 2021/22 = 6 out of 7 closed on time (86%)

5. Internal reviews (Stage 2):

a. Compliance

- 1. 2025/26 = 97 out of 138 completed on time = 70%
- i. 2024/25 = 56 out of 70 completed on time = 80%
- ii. 2023/24 = 54 out of 67 completed on time = 81%
- iii. 2022/23 = 57 out of 130 completed on time – 44%

b. Number of cases completed:

- i. 2025/26 = 135 (monthly = 11) – 93% increase
- ii. 2024/25 = 70 (monthly = 6)
- iii. 2023/24 = 67 (monthly = 6)

Appendix 1 - Yearly FOI Figures (1st April 2025 - 31st March 2026) – Draft

Doesn't reflect cases involving multiple service areas as allocation can only being assigned to one area.

	Total FOI's received	FOI's that went overdue	Non Compliancy %	Compliant %
City Operations	905	206	23%	77%
Place	131	32	24%	76%
Environmental Services	128	44	34%	66%
Culture and Environment	116	35	30%	70%
IT&D	43	23	53%	47%
City Infrastructure	487	72	15%	85%

	Total FOI's received	FOI's that went overdue	Non Compliancy %	Compliant %
Families Children and Wellbeing	370	150	41%	59%
Family Help and Protection	102	38	37%	63%
Commissioning and Communities	83	31	37%	63%
Education and Learning	158	76	48%	52%

Public Health	27	5	19%	81%
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	Total FOI's received	FOI's that went overdue	Non Compliance %	Compliant %
Homes and Adult Social Care	358	66	18%	82%
Adult Social Care	47	10	21%	79%
ASC Commissioning and Partnerships	29	9	31%	69%
Homes and Investment	123	18	15%	85%
Housing People Services	159	29	18%	82%

	Total FOI's received	FOI's that went overdue	Non Compliance %	Compliant %
Central Hub Directorate	444	152	34%	66%
Cabinet Office	13	5	38%	62%
Economic Development	6	2	33%	67%
Policy and Partnerships	7	3	43%	57%
Corporate Leadership Office	1	1	100%	0%

Emergency Planning	1	1	100%	0%
Property and Finance	232	76	33%	67%
Corporate Finance and Resources	30	11	37%	63%
Corporate Procurement	25	8	32%	68%
Insurance	6	1	17%	83%
Strategic Property	37	15	41%	59%
Welfare Revenues and Business Support	133	41	31%	69%
Internal Audit and Counter Fraud	1	0	0%	100%
Governance and Law	51	15	29%	71%
Democratic and Leadership Support	22	6	27%	73%
Electoral Local Land Charges and Registration Services	15	1	7%	93%
Legal Services	14	8	57%	43%

People and Innovation	147	55	37%	63%
Equalities Diversity and Inclusion	11	3	27%	73%
Facilities and Building Services	18	7	39%	61%
Human Resources	76	29	38%	62%
Innovation	31	7	23%	77%
Strategic Communications and Engagements	11	9	82%	18%

Appendix 2 - Subject Access Review 2025/26 (Draft)

Directorate	Sub direc	Team	All Closed	Compliance
Central Hub	CLT	Chief Exec Office	10	70%
Central Hub	CLT	Directors	6	100%
Central Hub	G&L	Democratic Services	11	82%
Central Hub	G&L	Electoral Services	17	94%
Central Hub	G&L	Legal	16	56%
Central Hub	G&L	Life Events	1	100%
Central Hub	P&F	Business Operations	2	100%
Central Hub	P&F	Financial Services	2	50%
Central Hub	P&F	Strategic Property	2	50%
Central Hub	P&F	WRBS - ALL	10	50%
Central Hub	P&I	Customer Feedback	30	93%
Central Hub	P&I	Equalities	2	100%
Central Hub	P&I	FOI	3	67%
Central Hub	P&I	Health and Safety	2	100%
Central Hub	P&I	HR	9	11%
City Ops	City Ops	Blue Badge	5	100%
City Ops	City Ops	Brighton Centre	3	100%
City Ops	City Ops	City Development & Regeneration	3	67%
City Ops	City Ops	Concessionary Travel	3	100%
City Ops	City Ops	Hackney Carriage	2	100%
City Ops	City Ops	Parking Services	12	92%
City Ops	City Ops	Planning	5	40%
City Ops	City Ops	RS - Animal Licencing & Wardens	1	0%
City Ops	City Ops	RS - Environmental Health & Licensing	2	100%

Directorate	Sub direc	Team	All Closed	Compliance
City Ops	City Ops	RS - Environmental protection	12	58%
FCW	FCW	BHISS	2	100%
FCW	FCW	Clermont	2	50%
FCW	FCW	Community Cohesion [Community Safety]	1	100%
FCW	FCW	CSWS	119	84%
FCW	FCW	Disability (under 25)	3	100%
FCW	FCW	Education & Learning	6	17%
FCW	FCW	Family Hubs & Youth	6	83%
FCW	FCW	Healthy lifestyles	2	100%
FCW	FCW	Home to School Transport	1	0%
FCW	FCW	Independent Visiting Service	1	100%
FCW	FCW	LADO	2	100%
FCW	FCW	Libraries	5	80%
FCW	FCW	MARAC	3	100%
FCW	FCW	Public Health	3	100%
FCW	FCW	SEN	30	67%
FCW	FCW	Youth Offending Service	1	100%
HASC	HASC	Adult Mental Health	5	80%
HASC	HASC	Adult Social Care	20	40%
HASC	HASC	Disability (25+)	3	33%
HASC	HASC	Housing - Complex Cases	1	100%
HASC	HASC	Housing - Leasehold	2	100%
HASC	HASC	Housing - Private Sector Housing	5	60%
HASC	HASC	Housing - Senior Housing	8	88%
HASC	HASC	Housing - Temporary & Supported Accommodation	15	33%
HASC	HASC	Housing Customer Services	83	71%

Directorate	Sub direc	Team	All Closed	Compliance
HASC	HASC	Housing Options	72	72%
HASC	HASC	Housing Repairs (Council Housing)	46	93%
HASC	HASC	Housing Tenancy	5	100%

SARs from Employees allocated to Services

Directorate	Sub direc	Team	All Closed	Compliance
Central Hub	CLT	EMPLOYEE - Cabinet Office	2	0%
Central Hub	CLT	EMPLOYEE - Chief Exec Office	2	0%
Central Hub	G&L	EMPLOYEE -Democratic Services	3	33%
Central Hub	P&F	EMPLOYEE - Audit	1	0%
Central Hub	P&F	EMPLOYEE - Procurement	1	100%
Central Hub	P&F	EMPLOYEE - WRBS	6	83%
Central Hub	P&I	EMPLOYEE - Customer Feedback	2	100%
Central Hub	P&I	EMPLOYEE - DSAR	2	0%
City Ops	City Ops	EMPLOYEE - Hackney Carraige	1	100%
City Ops	City Ops	EMPLOYEE - IT&D	1	0%
FCW	FCW	EMPLOYEE - Family Help and Protection	2	50%
FCW	FCW	EMPLOYEE - Skills and Employment	1	100%
HASC	HASC	EMPLOYEE - Adult Mental Health	4	100%
HASC	HASC	EMPLOYEE - Adult Social Care	3	67%
HASC	HASC	EMPLOYEE - Disability (25+)	1	100%

HASC	HASC	EMPLOYEE - Housing	1	100%
HASC	HASC	EMPLOYEE - Housing Customer Services	2	100%
HASC	HASC	EMPLOYEE - Housing Options	1	100%
HASC	HASC	EMPLOYEE - Housing Repairs	1	100%
HASC	HASC	EMPLOYEE - Housing Strategy	1	100%
HASC	HASC	EMPLOYEE - Seniors Housing	1	100%

Appendix 3 - Data breaches yearly breakdown:

Figures showing 01 st April – 31 st March 2026	City Operations	Property & Finance	Homes and Adult Social Care	Families Children & Wellbeing	People and Innovation	Governance and Law	TOTAL	Overall percentage
Disclosed in error (Email)	13	9	33	45	9	6	115	71%
Disclosed in error (Letter)	2	2	7	3	1	0	15	9%
Data Corruption	1	0	0	0	0	0	1	1%
Lost in transit	1	0	1	0	0	0	2	1%
Lost or Stolen Hardware	1	0	0	0	0	0	1	1%
Lost or Stolen Records	0	0	2	1	0	0	3	2%
Non-Secure disposal	0	0	0	0	0	0	0	0%
Technical security failure	0	0	0	0	0	0	0	0%
Unauthorised access	0	2	2	0	0	0	4	2%
Unlawful disclosure (Published online, shared in investigation, verbally etc)	3	2	7	2	1	3	18	11%
Other	0	0	1	0	1	0	2	1%
Cyber incident	0	0	0	0	0	0	0	0%
TOTAL	21	15	53	51	12	9	161	100%
Total percentage	13%	9%	33%	32%	7%	6%	100%	

Appendix 4 - Other key points to note (in consultation with Sarah Turner and Charnelle Jarrett)

1) Corrupted files:

We are aware that several records were corrupted in a migration that took place in 2012. When we are searching for records for children, we come across files that cannot be retrieved and now need to be able to inform requesters that not all of their information is able to be provided. The request of IGB is to note that we will add to requests when we find the problem.

Rationale:

The reason that this is necessary is because we have a duty to inform requesters where we have been unable to provide all of the information that the council holds. At present we are not able to quantify the scale of the issue but know that it involves at least hundreds of records. The Data Protection Officer is aware that the problem exists and historically did try to understand what action was needed but as far as we are aware no decision was ever taken as to whether the loss needed to be cited with the ICO.

We cant be sure that a requester would not inform the ICO of the problem and how they may respond.

The wording that we will use on all records where corrupted records are located is as below:

'We have identified files relating to yourself that are unfortunately corrupted. This corruption of data appears to affect documents from 2007 to 2010 and was due to a failed migration that happened in 2012. These files are not recoverable. We can't say for sure what information is contained in these files, but it may be that the information appears in other documents within your SAR. If there is a specific record that you were expecting that has not appeared in your SAR, you can contact us and we will try to locate it but please be aware that this may not be possible.'

2) Retention and Destruction

The standard retention and destruction for Information rights records is 3 years from disclosure for SARS and FOI. It is permissible to make a business decision to keep records for longer if there is an identified service need.

We will increase the retention period for Childrens SAR requests (CSWS only) from 3 years to 10 years.

Rationale:

It is known that CSWS SARS can be up to 15,000 pages long (18 to 21yrs of information) and hold very sensitive and (to the requestor) traumatic information. As such it can often take a requestor some years to process this information. We are increasingly seeing young people, re-requesting SARS that they have already received. This is often because they request the records as soon as they leave the care system at 18 – 21yrs and are not in permanent accommodation or their circumstances are very subject to change, this means they often do not access the SAR that they have been sent and then forget about it until they are in a more stable place. The ICO guidelines state that you cannot refuse a request as "repeated" if a reasonable period has passed. 5 years far exceeds any reasonable timeframe, making it almost certainly a new, valid request rather than a repeat. These SARS have often taken months to collate and redact, and a retention of ten years would mean that this work would not need to be repeated.

Children's services case information in some cases is kept for a minimum of 25 years but can be up to 99 years. This means that re requests are for information that will still be held in almost all cases.

On this basis we would increase the retention period for children's SAR records only for 10 years.

To note, currently no records have ever been destroyed so we hold records for SARS from over 5 years ago and we are currently in breach of the Data Protection Act, it would be a major piece of work to go back through all these SARS. Extending to ten years would mean that it is acceptable to still be holding some of these SARS and would support with increased demand on the service as well as increased repeat requests.