



London Borough of Camden
Information and Records
Management
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Date: 13/10/2022

Case reference: CAM3987

Dear Requester

Thank you for your request for information dated 27/09/2022 about **ICT policies and strategy documents for ICT security, cyber security, information security, cloud security and users etc.** We have dealt with this under the Freedom of Information Act 2000.

Response

The council holds the information requested. However, we are withholding some of the information because it is exempt as explained below. We have explained where we are withholding information and what exemption applies. Please see the refusal notice below which explains how and why it applies.

Refusal Notice

We are frequently asked for information about IT security in Camden. The council has considered these issues carefully and we have decided that we do not release this information. This is because we consider it is exempt under section 31 of the Freedom of Information Act 2000. We have explained why below.

section 31(1)(a) – Law Enforcement

We do not release information about what IT or related security policies and systems we have in place because we consider disclosing this information would make the council a target of crime. Therefore, this information is exempt from disclosure under section 31 of the Freedom of Information Act 2000.

Section 31(1)(a) says that we do not need to provide information that would be likely to prejudice the functions of law enforcement- the prevention and detection of crime. Camden believes that releasing this information would increase the likelihood

- of criminals using the information to target attacks against council systems. For example, knowing when we last updated a security system or policy would allow criminals to know

what vulnerabilities existed at that time and target attacks on those. It is important Camden does not do anything that would allow personal data it holds to be accessed illegally.

- knowing if Camden's policies and systems do not have particular vulnerabilities will increase the chances of other more vulnerable organisations being targeted by criminals

As Section 31 is a qualified exemption we need to consider the public interest test.

Factors in favour of disclosure:

- It would help transparency and accountability of the council
- It would reassure people about whether our policies or systems are vulnerable or not
- It would provide information about how effective our security systems are

Factors in favour of withholding:

- There is an inherent public interest in crime prevention.
- There is public interest in avoiding the costs (financial, distress, inconvenience, publicity, regulatory) associated with any attacks
- There is public interests in preventing any threat to the integrity of council data
- There is public interest in ensuring the council can comply with its duties to take all necessary steps to safeguard data

We believe that the balance of public interest lies in upholding the exemption and not releasing the information.

We do not give our consent for any names and contact details provided in this response to be sent marketing material. Any such use will be reported to the ICO as a breach of General Data Protection Regulations and the Privacy and Electronic Communication Regulations.

Why not check our Portal [Open Data Camden](#) before making a new request as your question may already be answered by a previous [FOI response](#) or in one of our many useful and interesting datasets.

Your Rights

If you are not happy with how your response was handled you can request an Internal Review within 2 months of this letter by email to foireviews@camden.gov.uk or post: Information and Records Management Team, London Borough of Camden, Town Hall, Judd Street, London WC1H 9JE. Please quote your case reference number. If you are not satisfied with the Internal Review outcome you can complain to the Information Commissioner's Office at icocasework@ico.org.uk, Telephone: 0303 123 1113, live chat <https://ico.org.uk/global/contact-us/live-chat/> or webform <https://ico.org.uk/global/contact-us/>. The ICO website <https://www.ico.org.uk> may be useful.

Yours sincerely,

Peter Williams
Information Rights Officer