

Please could you provide me with details of the current pay scale/officer grade for the following roles or their equivalent within your organisation:

- 1) Customer Services Manager
- 2) Complaints Manager/Coordinator
- 3) Information Governance Officer

The information held for Q1 to Q3 is exempt from disclosure. Section 40(2) of the Freedom of Information Act 2000 exempts personal data from disclosure where that disclosure breaches one of the data protection principles. Whilst the request does not ask for the names of the postholders, as there are only one or two individuals in each role, the postholders would be identifiable and therefore information about them would be personal data. Section 40(2) relies on one of three conditions being satisfied for the exemption to be engaged. The first condition - in section 40(3A)(a) - states that if disclosure would contravene the data protection principles then section 40(2) is engaged. The first data protection principle in Article 5 of the UK GDPR is that personal data processing must be lawful. Of the lawful bases for processing personal data set out in Article 6 of UK GDPR, only legitimate interests and consent would be possible. As the Council does not have the postholders' consent to share this personal data and there is no legitimate interest in putting it into the public domain, then the exemption under s40(2) is engaged and the personal data has been withheld from disclosure.

- 4) Data Protection Officer

Data Protection Officer – there is no separate position, the duties of this position are undertaken by the Assistant Director - Legal, Governance and Elections

- 5) FOI Coordinator

There is no role of FOI Coordinator and the work is shared across a number of individuals in the Information Governance Team. Their pay scale and grade would also be subject to the exemption.