



## **REQUEST 19410**

Please would you provide the answers to the below 4 points.

1. Email address and phone number of the Children's Placement's Team (often called the Brokerage Team or Home Finding Team or similar names.)
2. The Team Managers name and contact details of the Children's Placement's Team.
3. The name and contact details of the Head of Service for Looked After Children at the council.
4. The name and contact details of all commissioning managers for Looked After Children.

## **RESPONSE**

1. [placementsearches@wigan.gov.uk](mailto:placementsearches@wigan.gov.uk). There is no direct telephone line.
2. As below.
3. As below.
4. The Council confirms that it holds the information requested (Name of manager's and contact details). Section 40(2) of the Freedom of Information Act 2000 provides an exemption if the information requested constitutes personal data and if one of three conditions is satisfied; a name and contact details is personal data. The first condition under section 40(3A)(a) is satisfied if disclosure would breach any of the Data Protection Principles in UK General Data Protection Regulation (GDPR). The first data protection principle is that personal data processing must be lawful. The only possible lawful bases for disclosure under the Freedom of Information Act 2000 would be consent or legitimate interests. As those at senior management level – the Chief Executive, Directors and Assistant Directors - are accountable for many of the executive decisions made by the Council, there is a legitimate interest in disclosing their names in response to an FOI request. Furthermore, as they would expect their names to be in the public domain as senior managers, it would be fair to disclose their names in response to an FOI request. For staff below this level, i.e. Team Managers, they are not ultimately accountable for decisions and they would not necessarily expect their names to be in the public domain. Therefore, there is no legitimate interest in disclosing their details and any such processing would not be fair to them as data subjects. The Council therefore does not have a lawful basis to process the personal data of staff below Assistant Director Level in this way and section 40(3)(A)(a) of the Act is satisfied.