

26 May 2021

Our Ref: FOI8281

Dear

**Freedom of Information: Right to know request**

Thank you for your emails of 27 April 2021, in which you asked:

*Could you please list in chronological order all external individuals and organisations (and the representatives thereof) that Rob Gruppetta met with, either in person or virtually in his role as the Head of CMC Department between:*

*1 January 2020– 30 June 2020 (inclusive)  
1 July 2020 – 31 December 2020 (inclusive)  
1 January 2021 - 21 April 2021 (inclusive)*

You submitted three separate emails which have been aggregated and processed in accordance with the Act as one request under the reference shown above. Under guidance issued by the Ministry of Justice, a public authority may aggregate requests in the following circumstances (amongst others):

- Two or more requests for information have been made to the same public authority;
- The requests are from the same person; and
- The requests relate to the same or similar information.

The Guidance can be found [here](#) (see page 12).

We have processed your emails in line with the provisions of the Freedom of Information Act 2000 (FOIA) and our response is below.

**Our decision on your request**

We hold the information you requested. Please see Annex A for the information we can disclose to you. We are exempted from disclosing the names of the external individuals who attended these meetings under section 40 (personal data) of FOIA.

This is because the information constitutes the personal data of the applicant and is exempt under the Act. If the requested information is the requester's personal data, it is exempt under section 40(1) of the Act. For more information on why we are applying this exemption please see Annex B.

**Your right to complain under FOIA**

If you are unhappy with the decision we have made about your request, you have the right to request an internal review. To do so, please contact us within three months of the date of this response.

If you are not content with the outcome of the internal review, you also have a right of appeal to the Information Commissioner by phone or on their website at:

Telephone: 0303 123 1113

Website: [www.ico.org.uk](http://www.ico.org.uk)

Yours sincerely

Information Disclosure Team

## Annex A

Chronological list of external organisations that Rob Gruppetta, as the Head of the CMC Department:

[illegible]

[illegible]

|  |  |   |  |  |
|--|--|---|--|--|
|  |  | [s40], [s40],<br>[s40], [s40],<br>[s40], [s40],<br>[s40], [s40],<br>[s40], [s40],<br>[s40], |  |  |
|--|--|---|--|--|

## **Annex B**

- **Section 40 (Personal Information)**

To the extent that the information that we hold contains personal data about individuals, section 40(2)(b) of the Act provides that "*[a]ny information to which a request for information relates is also exempt information if the first, second or third condition listed below is satisfied.*"

We have applied this exemption because the first condition (as stated in section 40(3A) of FOIA) is satisfied. Some of the information you have requested comprises the personal data of individuals other than yourself which, if disclosed, would breach the requirement of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) ("GDPR") including the data protection principles of Article 5 and the Data Protection Act 2018 ("DPA")

In particular, it would be a breach of the first data protection Principle as set out in Article 5 of the GDPR, to disclose such information, as it would not be necessary or fair to the individuals concerned, or lawful, where none of the conditions in Article 6(1) of the GDPR have been met. The individual(s) concerned have not given their consent for their personal details to be made public and the release of such information may be detrimental to the individuals themselves.

This is an "absolute" exemption, and so it is not necessary to balance the public interest for and against disclosing the information.