

From: [REDACTED] <[REDACTED]@landregistry.gov.uk>

Date: 12 December 2017 at 13:16

Subject: RE: FOI request RE free release of Commercial and Corporate Ownership Data and Overseas Companies Ownership Data (our ref :-F171120-Boswarva)

To: "owen.boswarva@gmail.com" <owen.boswarva@gmail.com>

Dear Mr Boswarva,

Thank you for your email dated 14 November 2017 requesting the following information under the Freedom of Information Act 2000 (FOIA): -

“Last week Land Registry made its Commercial and Corporate Ownership Data and Overseas Companies Ownership Data available free of charge.

<https://www.gov.uk/government/news/hm-land-registry-makes-commercial-ownership-data-free>

(1) This is a request for information under the Freedom of Information Act. Please provide a copy of any privacy impact assessment prepared by or on behalf of Land Registry in connect with the free release of either or both of the above datasets.

(2) Please also provide a copy of any correspondence between, or any record held of any discussion between, Land Registry and the Information Commissioner's Office in 2017 that related to the free release of either or both of the above datasets.”

In relation to your request numbered 1 above, I attach a copy of the Privacy Impact Assessment Screening Record completed by HM Land Registry (HMLR) prior to the release of its Commercial and Corporate Ownership and Overseas Companies Datasets (free of charge versions).

Please note that some of the information in the document has been redacted in black. This information is exempt from disclosure under section 31(1)(a) and section 40(2) of the FOIA respectively.

Section 31(1)(a) provides an exemption if disclosure of the information would, or would be likely to, prejudice the prevention or detection of crime. In our view the exemption applies to the redacted information relating to HMLR's security procedures and processes. It is considered that disclosure of this information would make HMLR more vulnerable to criminal activity and would be likely to prejudice the prevention or detection of crime. In applying the above exemption, which is a prejudice based exemption, HMLR has to decide whether the public interest in refusing the request outweighs the public interest in releasing the information requested. Having considered the public interest, our decision is to withhold the information as there is a clear public interest in preventing the disclosure of information that would facilitate crime.

Under section 40(2) of the FOIA personal data about third parties is exempt information if complying with the request would breach data protection principles. The enclosed Privacy Impact Assessment Screening Record includes the names of certain individuals. This information has been redacted under

section 40(2) on the basis that disclosure would be unfair to the individuals concerned and would breach the fair processing principle contained in the Data Protection Act 1998.

With regard to your request numbered (2) I can confirm that HMLR does not hold the information requested.

If you have any queries about this letter, please contact me.

If you are dissatisfied with this response to your request, you may seek an internal review within two months of the date of our reply. Internal reviews will be dealt within 20 working days. If at the end of this time we are unable to respond, we will write to you explaining the reasons and giving you a new date. If you seek an internal review please write to:

Louise Booth  
Head of Corporate Legal Services (Core Services)  
Head Office  
Trafalgar House  
1 Bedford Park  
Croydon  
CR0 2AQ  
Email: [REDACTED]@landregistry.gov.uk

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner (ICO) within three months of the reply for a decision. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by HM Land Registry. The Information Commissioner can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Yours sincerely,

[REDACTED]  
Senior Corporate Information Officer  
Corporate Legal and Assurance Services

Email : [REDACTED]@landregistry.gov.uk Land Registry Head Office, 4th Floor, Trafalgar House, 1 Bedford Park, Croydon, CR0 2AQ GOV.UK | @LandRegGov | LinkedIn | Facebook

From: Owen Boswarva <owen.boswarva@gmail.com>

Date: 14 November 2017 at 20:27

Subject: FOI request RE free release of Commercial and Corporate Ownership Data and Overseas Companies Ownership Data

To: foi@landregistry.gov.uk

Hello,

Last week Land Registry made its Commercial and Corporate Ownership Data and Overseas Companies Ownership Data available free of charge.

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Please provide a copy of any privacy impact assessment prepared by or on behalf of Land Registry in connect with the free release of either or both of the above datasets.

Please also provide a copy of any correspondence between, or any record held of any discussion between, Land Registry and the Information Commissioner's Office in 2017 that related to the free release of either or both of the above datasets.

Thank you for your attention to this request.

Best regards,

Owen Boswarva

tel: [REDACTED]

address: [REDACTED]