



University of East Anglia

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[Redacted]

14 June 2018

Dear [Redacted]

Freedom of Information Act 2000 – Information request (ref: FOI_18-113)

We have now considered your request of 18 May 2018, as clarified on 22 May, for the following information:

'Under the FOI Act I would like a detailed list of all expenses claims or purchases made on official bank/credit cards made by your university's Vice Chancellor.'

[Clarified on 22 May to request data for calendar 2016 and 2017]

Our response is within the attached document 'FOI_18-113 Appendix A'.

On this occasion, it is not possible to provide all the requested information. The Act contains a number of exemptions that allow public authorities to withhold certain information from release. We have applied the following exemptions to part of your request.

Exemption	Reason
s.31(1)(a), Law enforcement	Some of the requested information would, or would be likely to, prejudice the prevention or detection of crime
s.40(2), Personal information	Disclosure of information would contravene one of the data protection principles

Section 31(1) exemption

It is our belief that section 31(1) applies to the credit card numbers that appear on the purchase card invoices provided. The University has a number of cards which are given to senior staff to allow for ad hoc purchase of goods and services necessary to their role within the University

Release of any information under the Act represents a disclosure to the world at large. As such, we believe to disclose this specific information would expose the University to a significant risk of fraudulent use of the University's credit cards, consequently prejudicing the prevention of criminal activity.

Having determined that disclosure of this information would expose the University to a real and significant risk of crime, application of the s.31 exemption also requires us to consider the public interest in withholding or disclosing this information.

We acknowledge there is a public interest in increasing transparency in how the University manages its finances, and this may include general information about the expenditures of senior staff within the organisation.

However, there is a very strong public interest in preventing criminal activity that could damage the running of the University and the security of the financial assets held by the University. On balance, we believe this interest outweighs any lawful public interest in sight of the credit card numbers. Additionally, we believe that provision of the level of detail regarding the expenditures as reflected on each credit card statement is sufficient to meet any public interest in knowing how the University spends such funds.

Section 40(2) exemption

In regards the application of section 40(2), we believe that there are data within the documents requested that consist of 'personal information' as defined by Article 4(1) of the General Data Protection Regulation (GDPR); specifically the names of certain UEA staff members.

We believe that disclosure of the information relating to individuals would be contrary to the requirements of Article 5(1)(a) of the GDPR; namely that information must be processed lawfully, fairly and in a transparent manner in relation to the data subject. These individuals would have no expectation that this information would be made publicly available, and we have not identified a lawful basis that would allow or require us to disclose this information.

Where information has been removed from the accompanying file in accordance with s.40(2) or s.31(1), we have replaced the text with a black rectangle.

We hope this response will meet your requirements, however if you are not satisfied you have the right of appeal. If you wish to appeal, please set out in writing your reasons for appealing and send to the above address. You must appeal within 60 calendar days of the date of this letter. Any appeal received after that date will not be considered nor acknowledged. This policy has been reviewed and approved by the Information Commissioner's Office.

You also have a subsequent right of appeal to the Information Commissioner's Office. Further information is available on their website:

https://ico.org.uk/Global/contact_us, or by telephone on 0303 123 1113.

Please note that any material over which UEA has copyright is released on the understanding that you will comply with all relevant copyright rules regarding reproduction and/or transmission of the information provided.

Please quote our reference given at the head of this letter in all correspondence.

Yours sincerely

Dave Palmer
Information Policy and Compliance Manager
University of East Anglia