

The Crown Estate Disclosure Log

Case no: 1140
Date received: 8 November 2019
Subject: Information Security and Data Protection
Request response
<p>I am writing in response to your email of 8 November 2019, in which you asked a number of questions which we have treated under the Freedom of Information Act 2000 (FOIA). I will answer each of your questions in turn.</p> <ol style="list-style-type: none"> 1. <i>Name of SIRO (Senior Information Risk Owner) or similar post (Chief Information Governance Officer etc), or responsible person for SIRO duties.</i> Rob Booth, General Counsel and Company Secretary. 2. <i>Contact email of person named in request No. 1.</i> We do hold this information but it is exempt as third party personal information whose disclosure would contravene any of the data protection principles. General contact details for The Crown Estate are available on our website at the following address: https://www.thecrownestate.co.uk/en-gb/contact/ 3. <i>Name of DPO (Data Protection Officer) or responsible person for DPO duties.</i> Martin Brazier, Head of Knowledge Management. 4. <i>Contact email of DPO.</i> Please see answer to question 2. 5. <i>Name of person with overall responsibility for Cyber security or equivalent (excluding persons in q1 and q3).</i> Tom Moore, Head of Business Technology. 6. <i>Contact email of person in Q5.</i> Please see answer to question 2. 7. <i>Name of person with overall responsibility for information security or equivalent (excluding persons in q1, q3 and 5).</i> N/A. 8. <i>Contact email of person in Q7.</i> N/A. 9. <i>Name of person with overall responsibility for information Governance or equivalent (excluding persons in q1, q3, q5 and q7).</i> N/A.

10. *Contact email of person in Q9*

N/A.

11. *Do you have appointed IAOs? If so, whom are they, if they have been defined?*

Yes. They are generally heads of function.

12. *Are you or have you considered becoming ISO 27001 compliant or certified? If so whom is responsible for maintaining this? (as in, the person)*

Yes – we are ISO 27001 certified. The SIRO.

13. *Contact email of person in Q: 11.*

Please see answer to question 2.

14. *Are you required to connect to the PSN Code of Connection (CoCo)? If so whom is responsible for complying with its requirements? (as in, the person)*

No

15. *Contact email of person in Q:13.*

N/A.

16. *What is the annual budget for Cyber Security?*

17. *What was the annual spend on external assistance for cyber security last financial year? (Excluding products/systems, when I refer to external assistance I mean things like consultancy/training)*

18. *What is the annual budget for data protection activities?*

19. *What was the annual spend on external assistance for data protection activities last year? (Excluding products/systems, when I refer to external assistance I mean things like consultancy/training)*

I have responded to questions 16-19 as one. We do hold this information but have concluded that section 43(2) FOIA applies to it, as to disclose this would damage The Crown Estate's commercial interests. When applying section 43(2), it is necessary to consider whether the public interest in maintaining the exemption outweighs the public interest in disclosing the information. We recognise that there is a legitimate public interest in being open and transparent about spending by The Crown Estate as a public authority, but the disclosure of this specific detail would prejudice The Crown Estate's ability to negotiate competitive prices with future parties and would harm the commercial interests of it as a result.

As the revenue surplus of The Crown Estate goes to the public purse, we have decided that the public interest in maintaining commercially robust outcomes in terms of future Crown Estate revenue outweighs the public interest in making them public. There is a public interest in the information being available, but it is a minor one when compared with safeguarding our commercial position for the benefit of the public purse.

I hope that this response is helpful. However, if you are not satisfied with the way we have handled your information request, you may appeal our decision which will then be investigated through an internal review. If you are not content with the outcome of that, you have the right to refer any complaint directly to the Information Commissioner's Office (ICO) (contact details are available at: www.ico.org.uk). The ICO will usually expect you to have first exhausted our own complaints procedure before raising any concerns

with them.