

Date: 6th July 2021
Our reference: ICO ref: IC-86031-M6N2
Email: dpo@camden.gov.uk

Information & Records Management
Business Support Service
Law & Governance
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Re: UK General Data Protection Regulation, Data Protection Act 2018, Local Government (Miscellaneous Provisions) Act 1982 (in relation to Licensing Applications & Renewals of Sexual Entertainment Venues (SEV)).

The ICO has contacted us about our response to you dated 26th May 2021. They considered that we had not adequately responded to your complaint regarding the disclosure of your name as an objector on documents relating to a Licensing Application for a Sexual Entertainment Venue (SEV).

We have reviewed our response of 26th May 2021 and agree that this did not address your main area of concern but rather focussed on a lesser issue that had also been raised in a similar case. We should not have combined these two cases and we should have provided you with a much better response that directly addressed your concerns. I apologise unreservedly for this inadequate response.

Our Legal team and Information Rights team have reviewed the original response we sent you on 18th December 2020 and subsequent correspondence that you had with us. We have decided that our current licensing procedures do not include special conditions for SEV licensing applications which are recognised in the Local Government (Miscellaneous Provisions) Act 1982 Schedule 3 para 10 (17) (LG(MP)A) which you drew our attention to. This states 'The appropriate authority shall not without the consent of the person making the objection reveal his name or address to the applicant.'

Our current form for registering an objection to a licence application states that if you wish to remain anonymous then you should tick a box. This is valid for most licensing applications but as you rightly stated, it is not valid for SEV applications as these require the opposite ie your details will remain anonymous unless you give consent to reveal your name by ticking a box. We apologise that we did not find this specific provision in the LG(MP)A during our original investigation into your concerns. This was an oversight on our part.

We will now take the following actions in relation to SEV Licensing applications:

- Amend the e-form to include an additional consent section which will explain that the default for SEV objections will be to remain anonymous unless consent is given to reveal the names.
- Remove objectors' names from SEV Licensing documents that are passed on to the applicant or their representative.
- Use this learning for training colleagues in Legal, Licensing and Information Rights

Once again, I apologise for the poor responses you have received from us in relation to this and for the time it has taken to resolve. I trust that this now resolves your concerns.

Yours sincerely,



Jim Read
Service Manager
Information & Records Management
Business Support Service