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Sue Pearson
via email: chair.glera@gmail.com

Telephone: 0207 332 1243

Email:
information.officer@cityoflondon.gov.uk

Date: 2 April 2026

Dear Sue Pearson

Data Protection Act 2018 – Data Breach raised in relation to the publication of the full schedule of owners as part of planning application 26/00106/FULL

We are writing in response to your email of 14 March 2026, and in which you raise concerns regarding the use of personal data as part of the planning application for 26/00106/FULL

We note that your email of the 14 March raises the following concerns

- Data Breach – Schedule of owners published in error on the City of London’s website

Following the concerns raised the City of London Corporation has reviewed the matter and we respond as follows.

Additionally, we note that upon receipt of your email, the schedule of owners was taken down from the relevant webpage, while this matter has been reviewed.

- **Data Breach – Schedule of owners published in error on the City of London’s website**

We note that upon review of this matter, there are two separate activities where the personal data was processed:

- Personal data processed for the purposes of administering the planning application.
- Personal data which has been published online as part of the planning application documents.

Firstly, the City of London Corporation confirms that it is necessary for a schedule of owners, which sets out the details of all owners of an application site to be supplied to the Corporation as part of the planning application process. We note that Certificate B, which is part of the Application Form refers to the ownership certificate required under the Town and Country Planning Act 1990. It is submitted when the applicant is not the sole owner of the land. Certificate B states that the applicant knows who the owners are, and that the applicant notified all owners about the Planning Application. Applicant has a lawful requirement to serve notice to the correct owner. Local Planning Authority

is obligated to publish the certificate, as a part of the Application Form on the public planning register.

Therefore, where the personal data contained within the schedule of owners is used for the purposes of administering the planning application, the City of London finds that no data breach has occurred in this instance.

However, it is the second element of this activity, (publishing personal data online), where we consider that a data breach has occurred in this instance. We have undertaken a review of this matter against the data protection principles and find that a breach has occurred in relation to the first, third and sixth data protection principles. In our review of this matter, we have also considered whether the matter should be referred to the Information Commissioners Office (ICO) and following our review, we note that the incident does not meet the requirements for mandatory reporting to the ICO.

1. Lawful, fair and transparent

With reference to the first data protection principle, while we note that while it is *necessary for the performance of a task carried out in the public interest* that the personal data contained within the Schedule of Owners is held and processed for the purpose of administering the planning application, the lawful basis relied upon does not extend to the publication of this personal data online via our website.

In addition, we also consider that it was not fair that the personal data published online was processed in this way.

With regards to the transparency element of principle 1, while we note that the Environment Department's privacy notice on the City Corporation's website (for the Planning & Development Management section) provides that one of the reasons why personal data is used is to 'maintain the statutory register of planning applications' and that sometimes personal data will be made public on our website and via committee agendas, it is not considered that this was intended to cover the publication of the personal data in this situation.

2. Purpose limitation

In regard to the second data protection principle, we do not consider a data breach has occurred in this instance.

3. Adequacy

With regards to the third data protection principle, we have reviewed the matter and consider that the adequacy principle has been breached in this instance. In this instance, it was not necessary for the Schedule of Owners to be published online.

The application form submitted through the Planning Portal is received in two separate files: an unredacted version (comes as sensitive) and a redacted version (for public). In the unredacted version, the owner's name wasn't listed in Certificate B. In this instance, the case officer noticed the list missing and requested it from the Agent (4th March 2026). Once received (10th March 2026), the planning officer forwarded the file to the Admin team inbox asking for it to be uploaded

(11th March 2026). The file has been made sensitive on 16th March 2026 and is no longer publically available.

4. Accuracy

In regard to the fourth data protection principle. We do not consider a data breach has occurred in this instance.

5. Storage limitation

In regard to the fifth data protection principle. We do not consider a data breach has occurred in this instance.

6. Security

Lastly, with regards to the sixth data protection principle we have reviewed the actions taken and uphold your concerns, in this instance the publication of the Schedule of Owners in error on our website/planning application portal, has resulted in the personal data being processed in a manner that was not secure.

As noted earlier in our response, upon notification of this incident, the City of London Corporation, immediately took steps to take down the Schedule of Owners which had been published in error and in doing so we acted promptly to mitigate the impact of any security concerns. Following the matters raised, we note that personal data held within the Schedule of Owners is now being held securely within the City of London's systems.

In summary of the matters raised, we would like to offer our sincere apologies for the breach that has occurred and note that the error occurred as a result of human error and note that we uphold your complaint.

Following notification of this incident, the document containing the Schedule of Owners has been taken down from our website, and the Schedule of Owners has been permanently removed from publication on our website and we can confirm that there is no intention to republish the Schedule of Owners.

In addition, following the incident being raised, further guidance has been provided to the team responsible for this personal data, as to the importance of checking documents to ensure that only the relevant documents are published. The City of London will also be undertaking a review of the procedures which lead to the publication of planning documents, to prevent this from occurring

again, and further guidance notes will be provided to the team in addition to the matter being raised at the next team meeting.

Should any resident have further questions concerning this instance we recommend that they are asked to contact the Compliance Team: information.officer@cityoflondon.gov.uk, and we will review the matters raised.

Lastly, we note that as the names and postal addresses were included on the webpage, it may be possible that the personal data was captured as part of key terms that are captured and used by Google to create search results (known as a Google Cache). A good way to check this is for the resident to undertake a search of their name and see if any results come up which link them to the *Schedule of Owners*.

Any impacted residents are recommended to contact Google directly and request the removal of their personal data from any search engines and we note that the following link provides helpful information as to how to remove the personal data from the search results.

[\[video\] How to Remove Personal Information from Google Search: Step-by-Step Guide - Google Search Community](#)

We hope this response is helpful in explaining to you the City of London's Corporation's position with regard to the issues that you have raised and would like to thank you for raising these matters with us.

If you wish to make a complaint about the way the City Corporation has handled your concerns, please make your complaint in writing to the Compliance Team, Comptroller and City Solicitor's Department, City of London, PO Box 270, Guildhall, London EC2P 2EJ (or email information.officer@cityoflondon.gov.uk).

Alternatively, you may wish to contact the Information Commissioner for issues relating to the Freedom of Information Act 2000 and the Data Protection Act 2018. The Information Commissioner is a Crown appointment, responsible for monitoring compliance with the DPA. Please contact: Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone: 0303 123 1113. The website for his office is at: <http://www.ico.org.uk/>

Yours sincerely,



Comptroller & City Solicitor
Deputy Chief Executive