

Derby City Council – Response
ID Reference FOI938460154
Date 31/07/2026

Information Requested	Response
I would like to request the Council's current list of all domestic properties within the Derby City Council area, including:	
a.full address	The Council confirms it holds the information requested. However, the information will not be disclosed because the following absolute exemption applies. Section 40 Personal Data This exemption applies to part of the full address – addr1,addr2, addr3, addr4 on the attached spreadsheet response. In determining this exemption the Council has taken into account the ICO guidance : What factors should we consider when assessing the possibility of identification? You should consider what means are reasonably likely to be used to identify the individual taking into account all objective factors, such as: • the costs and amount of time required for identification; • the available technology at the time of the processing; and • likely technological developments. You should also document this assessment. Your starting point might be to look at what means are available to identify an individual and the extent to which these are readily

available. For example, if searching a public register or reverse directory would enable you to identify an individual from an address or telephone number, and you are likely to use this resource for this purpose, you should consider that the address or telephone number data is capable of identifying an individual.

You should assume that you are not looking just at the means reasonably likely to be used by an ordinary person, but also by a **determined person with a particular reason to want to identify individuals**. For example, investigative journalists, estranged partners, stalkers, or industrial spies.

Assessment

Under the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018, any information, such as a home address, that can directly or indirectly identify a living individual is considered personal data.

This is because it reveals the exact location of an individual and is closely linked their identity

Although individuals can use online search engines, for example, Valuation Office to find out the band for individual properties. The online search tool do not provide a list of all domestic property addresses/banding details for a specific city/local authority area.

Disclosure of the full address details into the public domain would in our view provide a 'determined person' with the information required to find out the name of the individuals who live at the address.

For example, the address details in the list could be cross referenced with a copy of open register which is an extract of the electoral register which can be purchased by any person, company or organisation. The open



	register includes the name and address individuals. The open register and list could be quickly compared by uploading the details onto a computer, then use Excel or similar package to find matching addresses and identify the name of individuals at the address. Additionally, having used the full address to determine the names of individuals, it could then be combined other information held outside the Council to collate more personal data about the named individual which could then be used for identity fraud etc
b. the assigned Council Tax band	Please see column 'G' on the attached spreadsheet response.
c. Council's property reference	Please see column 'A' on the attached spreadsheet response.
d. Unique Property Reference Number (UPRN) for each property on the list.	Please see column 'H' on the attached spreadsheet response.

Please note, the following applies, if the response includes council officers (or other officers) names.

If you are a company that intends to use the names and contact details of council officers (or other officers) provided for direct marketing, you need to be registered with the Information Commissioner to process personal data for this purpose. You must also check that the individual (whom you wish to contact for direct marketing purposes) is not registered with one of the Preference Services to prevent Direct Marketing. If they are you must adhere to this preference. You must also ensure you comply with the Privacy Electronic and Communications Regulations (PECR). For more information follow this Link www.ico.org.uk

For the avoidance of doubt the provision of council (and other) officer names and contact details under FOI does not give consent to receive direct marketing via any media and expressly does not constitute a 'soft opt-in' under PECR.