

Official

Ref: FOI-217

11 March 2019

[REDACTED]  
Sent via email only:  
[REDACTED]

Dear [REDACTED]

1. Thank you for your email dated 11 February 2019, in which you requested information from UK Anti-Doping ('UKAD') under the Freedom of Information Act 2000 ('the Act'). You requested information relating to the IT systems in place at UKAD. Specifically, you asked for the following information:

*1. Local Area Network*

- a) *What Manufacturer is your LAN Network?*
- b) *What date does your support contract come up for renewal on the LAN Network?*
- c) *What is the current cost of the LAN Network Support?*
- d) *Which company is the support contract with?*

*2. Contacts*

- a) *Who is responsible for ICT in the organisation and what are their contact details?*
- b) *Who is responsible for ICT Infrastructure in the organisation and what are their contact details?*
- c) *Who is responsible for ICT Purchasing in the organisation and what are their contact details?*

*3. Staff*

- a) *How many IT users do you have?*
- b) *How many locations/offices do you have?*

## Summary of response

---

- UKAD is disclosing the information you have requested at items 1 b), 1 d), 2 a), 2 b), 2 c), 3 a) and 3 b) of your request.
- UKAD is not disclosing the information you have requested at items 1 a) and 1 c). The detail of the basis for this response is set out below.

## Parts 1 b), 1 d), 2 a), 2 b), 2 c), 3 a) and 3 b) of your request

---

- UKAD confirms that it holds the information requested and provides a response to your request via the table below:

Item	Information held
1 b)	The current LAN support contract is due for renewal on 13 January 2022
1 d)	The current contract is with Koris Limited ('Koris') (Company No. 06215347)
2 a) 2 b) 2 c)	The staff member responsible for ICT, including infrastructure and purchasing, can be contacted at: <a href="mailto:IT.Systems@ukad.org.uk">IT.Systems@ukad.org.uk</a>
3 a)	There are currently 75 IT users at UKAD
3 b)	UKAD has only one office location:  Fleetbank House 2-6 Salisbury Square London EC4Y 8AE

## Parts 1 a) of your request

---

- UKAD confirms that it holds the information requested. However, we are withholding this information under the exemption provided in section 31 of the Act on the grounds that releasing the information would be likely to prejudice the prevention of crime.
- Section 31(1) provides as follows:

*Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice*

–

*(a) the prevention or detection of crime...*

7. UKAD has concluded that disclosure of the manufacturer of its LAN network would be likely to prejudice the prevention of crime, in that it would be likely to expose UKAD to cyber-attacks in the future. This is because this information could be used by hackers to determine the vulnerabilities of UKAD's LAN network when planning and executing further attacks. The real likelihood of such attacks is evidenced by a previous successful attack on the World Anti-Doping Agency ('WADA')<sup>1</sup> and an unsuccessful attack on UKAD<sup>2</sup>, and the National Cyber Security Centre advises public authorities that targeted attacks may seek to 'attack equipment or software being delivered to the organisation'<sup>3</sup>. As such, disclosure of this information is likely to prejudice the prevention of crime, being the prevention of future cyber-attacks.
8. Having determined the prejudice that would likely arise from disclosing the manufacturer and costs of supporting UKAD's LAN network, UKAD has gone on to consider whether the public interest test requires disclosure of this information.
9. UKAD recognises the importance of transparency and accountability, including the advantages of public oversight of the cyber security systems adopted by public authorities. UKAD acknowledges that there is a public interest in assuring the public that IT security issues are being taken seriously, including using an appropriate manufacturer to protect the organisation.
10. On the other hand, there is also a public interest in ensuring the continued effectiveness of UKAD's (and other organisations') cyber security systems and the protection of data (including third party personal data) held by those systems from hackers. This is especially important given the sensitive personal data which UKAD holds, such as personal medical records.

---

<sup>1</sup> <https://www.wada-ama.org/en/media/news/2016-09/cyber-hack-update-data-leak-concerning-41-athletes-from-13-countries-and-17>

<sup>2</sup> <https://ukad.org.uk/news/article/uk-anti-doping-statement-on-cyber-attack>

<sup>3</sup> National Cyber Security Centre, 'Common cyber attacks: reducing the impact', available at: [https://ncsc-content.s3.eu-west-1.amazonaws.com/common\\_cyber\\_attacks\\_ncsc.pdf](https://ncsc-content.s3.eu-west-1.amazonaws.com/common_cyber_attacks_ncsc.pdf)

11. Having considered the public interest arguments both for and against maintaining the exemption, UKAD has concluded that the balance of the public interests falls in favour of non-disclosure in this instance.

### **Part 1 c) of your request**

---

12. UKAD confirms that it holds the information requested. However, we are withholding this information under the exemption provided in section 43 of the Act on the grounds that releasing the information would be likely to prejudice the commercial interests of both UKAD and a third party (Koris).

13. Section 43(2) provides as follows:

*Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).*

14. UKAD has concluded that information about the cost of its LAN network support contract is also exempt from disclosure because to do so would be likely to prejudice the commercial interests of both UKAD and Koris. This is because revealing such commercially sensitive information to Koris' competitors would be likely to place Koris at a disadvantage in future negotiations with both UKAD and other organisations; specifically, disclosing the company's pricing structure could enable competitors to undercut Koris in the future.
15. Likewise, revealing the fees paid by UKAD would likely adversely affect UKAD's bargaining position in any future negotiations for its LAN network support contract and result in less competitive tender applications being made. Disclosing such information would also be likely to deter other companies from contracting with UKAD (and other public authorities) in the future, undermining UKAD's ability to obtain value for money in future contracts.
16. Having determined the prejudice that would likely arise from disclosing the costs of UKAD's LAN network support, UKAD has gone on to consider whether the public interest test requires disclosure of this information.
17. UKAD recognises the public interest in public authorities being transparent and accountable, particularly in relation to expenditure of public funds. UKAD also recognises that it is in the public interest to ensure that authorities are obtaining value for money, and that disclosing the cost of UKAD's LAN network support contract would allow the public to undertake such an evaluation.

18. Conversely, there is also the public interest in fairness of competition and in ensuring that the ability of public authorities to obtain value for money is not undermined. Disclosure of fees paid to Koris would be likely to damage its ability to compete on a level playing field and cause fair competition to be reduced, simply because Koris has contracted with a public authority. As a result, the risk arises that fewer companies may be willing to contract with UKAD and that less competitive tender applications will be made, undermining UKAD's ability to obtain value for money in its future expenditure of public funds.
19. Having considered the public interest arguments both for and against maintaining the exemption, UKAD has concluded that the balance of the public interests falls in favour of non-disclosure in this instance. UKAD has also considered the decision of the Information Commissioner in FS50704057 and FS50752638 in coming to this conclusion.

### **Conclusion**

20. If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original request (i.e. two months from the date of this letter) and should be addressed to: Matthew Johnson, Director of Legal and Regulatory Affairs, UK Anti-Doping, Fleetbank House, 2-6 Salisbury Square, London EC4Y 8AE. Please remember to quote the reference number above in any further communications.
21. If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Yours sincerely



UK Anti-Doping