ANNEX A

FOI DOF/2026-0103

Request

You have confirmed that suppliers must comply with CESG Infosec Standard 5 and relevant NCSC criteria, and that the Department receives reporting on actions taken at disposal stage.

For clarity, the Information Commissioner's Office has previously stated that reliance on a destruction certificate may be sufficient provided the controller has ensured that the data has been destroyed effectively.

In that context, please confirm whether the Department holds any recorded information demonstrating that compliance with CESG Infosec Standard 5 constitutes verification that software based erasure is effective in practice for the storage media involved, rather than confirmation that a prescribed overwrite process was executed.

Specifically:

Does the Department hold recorded evidence demonstrating that compliance with IS5 is treated as verification that the final data state is irretrievable on modern solid state and NVMe storage media?

Does the Department hold any recorded information assessing whether overwrite based compliance under IS5 remains effective given the architectural characteristics of flash based storage, including wear levelling and remapped blocks?

What recorded evidential assurance does the Department rely upon to conclude that the final data state of devices subject to software based erasure is irrecoverable, beyond confirmation of compliance with the standard?

This request relates solely to clarification of the recorded assurance framework relied upon in concluding that personal data has been rendered irretrievable

Response

I can confirm the Department of Finance holds some of the information requested.

Does the Department hold recorded evidence demonstrating that compliance with IS5 is treated as verification that the final data state is irretrievable on modern solid state and NVMe storage media?

Yes

Does the Department hold any recorded information assessing whether overwrite based compliance under IS5 remains effective given the architectural characteristics of flash based storage, including wear levelling and remapped blocks?

Information is not held to this detail.

What recorded evidential assurance does the Department rely upon to conclude that the final data state of devices subject to software based erasure is irrecoverable, beyond confirmation of compliance with the standard?

Certificate received with written Guarantee of data wiping.

Annex B - Internal Reviews

An Internal Review request examines the response based on applied exemptions, search adequacy, or response timeliness.

It is not the following, which will be treated as specified:

- Questions asking for clarification on information provided: Will be treated as part of the original FOI request.
- Additional questions about the information in the response: Will be treated as a new FOI request.
- Questions about the subject not related to the original request: Will be treated as new FOI request.
- Questions regarding how a service operates or why a decision was made: Will be treated as normal business and responded to accordingly.
- Complaints or concerns raised in response to information provided: Will be treated in line with relevant complaints procedure.

To make an Internal Review request:

- **Clearly state**: That you want an internal review of a previous FOI response and provide the necessary details.
- **Follow the timeline:** Be sure to submit your request within 40 working days of receiving the original response. If the Department has not responded at all, you have 40 working days after the original 20-day response period has passed.
- **Wait for a response:** The review is typically completed within 20 working days but can take up to 40 working days in exceptional circumstances. The Department should inform you of any delays.

What the review includes

- A fresh decision based on a reconsideration of all relevant factors.
- An assessment of whether the request was handled correctly and if exemptions were applied appropriately.
- The review will be conducted by someone who was not involved in the original decision.

If you wish to request an internal review, please email foi@finance-ni.gov.uk or write to FOI/EIR Team, Department of Finance, 2nd Floor, Craigantlet Buildings, Stoney Road, Belfast, BT4 3SX.