



# **WILTSHIRE FIRE & RESCUE SERVICE**

**Manor House, Potterne, Devizes, Wiltshire, SN10 5PP  
Telephone 01380 731170**

**FREEDOM OF INFORMATION ACT 2000**

## **CODE OF PRACTICE**

## **WILTSHIRE FIRE & RESCUE SERVICE FREEDOM OF INFORMATION ACT 2000 - CODE OF PRACTICE**

### **PROCESSING AN INFORMATION ACCESS REQUEST**

#### **1. Introduction**

- a. The Freedom of Information Act came into force on 1 January 2005.
- b. The Wiltshire Fire & Rescue Service have produced a Publication Scheme that has been approved by the Information Commissioner. (See Appendix 1).
- c. The Freedom of Information Act gives members of the public the right to request any information from the Wiltshire Fire & Rescue Service that isn't already publicly available to them.

#### **2. Prior to Disclosure**

- a. Applicants requesting information of a personal nature should be advised that their request will be dealt with under and according to the rules of the Data Protection Act 1998.
- b. Applicants requesting information that we already make publicly available from another source can have the application refused. They should be advised of the reason and be told where they can find the information they're looking for. e.g. local health centre, libraries – written and electronic, local community group offices, our website etc.

If the request is for 'exempt' information, the applicant must be advised and be given details of the reason why. e.g. quote the legislation etc. (See Appendix 2).

Where the 'exempt' information can be looked at under the 'public interest test', carry this out, with guidance from your Unit Head prior to disclosure. (See Appendix 3).

Charges for information will be free up to a maximum amount of £450.00. If a request is estimated to be over the appropriate limit then we do not have to comply. But if we choose to then we would take account of costs we reasonably expect to incur in relation to the request in:

- Determining whether we hold the information
- Locating the information or documents which contain the information
- Retrieving the documents
- Extracting the information contained from a document
- The time spent in collating requested information will be set at £25.00 per person per hour.

The request must:

- Be in writing or electronic, e.g. e-mail.
- State in what format the applicant would like their information.
- Give the applicant's name and address.
- Full details of the nature of the information required.

### **3. Receiving Requests**

The request should be made to the Service's designated Information Rights Advisor, the person nominated to respond to the request for information and whose duty it is to help the applicant. The Information Officer will make arrangements for banking any fees.

### **4. Fees/Charging/Time Limits for Response**

If a fee is to be charged then it should not include any time spent on the 'public interest test'. The cost should cover searching, copying and disbursement costs.

If this amounts to more than £450, the request can be refused.

The applicant must be told the charge and advised that the request cannot be forwarded until the fee is paid.

The Finance Department should be asked to raise and send an invoice as soon as both parties agree the charge.

Once the detailed request has been received, the search for information can begin. If the request incurs a fee then the information will not be released until the agreed fee has been received.

The Act gives us 20 working days from receipt of the applicant's request to provide a response.

### **5. Processing the Request for Information**

Using the detailed information provided by the applicant, get the help of all relevant Information Managers with providing the information held by them and matching the applicant's requirements.

Collate the information and check to ensure that none of it is classed as totally 'exempt' (See Appendix 2). Where it is, remove it before disclosure.

Where it is 'exempt' but subject to the 'public interest test' (See Appendix 3) apply the considerations and make a decision whether to disclose or withhold. Do this with the guidance of your Information Manager or Information Officer.

Produce the information in the way the applicant requested.

Where all/part of the information has not been provided, the applicant should be told of the reasons/piece of legislation for the refusal to disclose.

Remember that you are working to a deadline of 20 working days.

A full record of the disclosure must be made in the logbook held by the Service's Information Rights Advisor. The log asks for the following information:

Name and address of applicant.  
Details of information requested.  
Details of information disclosed.  
Details of information denied and why.  
Date of request.  
Date fee received if applicable.  
Date response made to applicant.  
Time limit met yes/no.

The applicant's response should be sent as per instruction – written or electronic.

Where a request was turned down under the 'more than £450 costs' rule, a note should be made in the Information Rights Advisor's logbook. This is to ensure that consultative or campaign requests made by one person or different persons in concert or in pursuance of a campaign, can be logged. When calculating whether the £450.00 limit has been reached in complying with any one request you aggregate the cost of complying with all of them. However they must be 2 or more requests that relate to the same or similar information and be received within any 60 consecutive working day period.

'Working Day' means any day other than a Saturday, Sunday, Christmas Day, Good Friday or any day, which is a Bank Holiday in any part of the United Kingdom.

## **6. Complaints about the Information Provided/Refused**

The applicant has the right to write in to complain about the lack of information disclosed or appeal against our reasons for not disclosing. He/she must be provided with full details of the Wiltshire Fire & Rescue Services/Authority's, Comments, Compliments and Complaints Policy and given any assistance required in making the complaint.

If a complaint is received, it must be progressed through the Wiltshire Fire & Rescue Service/Authority complaints procedure.

The standard letters produced in compliance with this Policy, advise that there is an ultimate right of appeal to the Information Commissioner.

The Information Commissioner will only investigate appeals that have failed to be resolved by using the Wiltshire Fire & Rescue Service/Authority official complaint procedures.

## Appendix 1

### **WILTSHIRE AND SWINDON FIRE AUTHORITY FREEDOM OF INFORMATION ACT 2000 PUBLICATION SCHEME**

#### INTRODUCTION

1. One of the aims of the Freedom of Information Act (FOIA) 2000 is that public authorities should be clear and proactive about the information they will make public. To do this they must produce a publication scheme that sets out:

- a. The classes of information, which they publish or intend to publish.
- b. The manner in which the information will be published.
- c. Whether the information is available free of charge or on payment.

The Wiltshire Fire & Rescue Service publication scheme consists of information already published and held by the Authority or information, which is to be published in the future. This means that all information in our publication scheme is either accessible on our website to download and print off or is available in traditional document form. Information within the publication scheme will be available either free of charge or subject to a fee. Items subject to a fee or free of charge will be detailed later in this publication. Some information that we hold may not be made public; this would include information about national security or court records.

2. The Principal Fire Officer responsible for the maintenance and implementation of this scheme is:

Deputy Chief Fire Officer  
Wiltshire Fire & Rescue Service  
Service Headquarters  
Manor House  
Potterne  
Devizes  
SN10 5PP

Telephone: 01380 731170  
Email: [enquiries@wiltsfire.gov.uk](mailto:enquiries@wiltsfire.gov.uk)

3. The Information Compliance Officer responsible for the day to day operation of this publication is:

Wiltshire Fire & Rescue Service  
Service Headquarters  
Potterne  
Devizes  
SN10 5PP

Telephone 01380 731170  
Email [enquiries@wiltsfire.gov.uk](mailto:enquiries@wiltsfire.gov.uk)

## **CLASSES OF INFORMATION PUBLISHED BY THE WILTSHIRE AND SWINDON FIRE AUTHORITY**

4. The publication scheme guides you to information, which we currently publish, have recently published or which will be published in the future. This is split into 'classes' of information. The 'classes' of information currently published are contained in paragraph 9 of this publication. Details of how the information is or will be published and any fees that may be charged for information is also contained in paragraph 8. The classes in this publication are based on our departmental functions. Under each heading there is a list of the information, which we publish, which relates to that function. For example, information under the heading of 'personnel' includes recruitment, training, discipline policies and so on.

## **FUNCTIONS OF THE WILTSHIRE AND SWINDON FIRE AUTHORITY AND WILTSHIRE FIRE & RESCUE SERVICE**

5. The Authority is responsible for carrying out the duties required by the Fire and Rescue Services Act 2004. These include:

- a. Securing the services of the Wiltshire Fire & Rescue Service.
- b. Securing the efficient training of its fire fighters.
- c. Making sure arrangements are in place to receive calls and summon members of the fire Service.
- d. Gathering information on the character of buildings and water supplies.
- e. Securing arrangements to alleviate damage to property in the course of firefighting.
- f. Giving fire safety advice.
- g. Enforcing laws providing for fire safety within Wiltshire and the Borough of Swindon.
- h. Rescuing people from road traffic accidents and protecting them from serious harm in the event of such an accident.
- i. Deployment of mass decontaminating equipment following a chemical, biological, radiological or nuclear incident.
- j. Responding to severe weather conditions e.g. pumping water from flooded premises.

The Authority receives an annual budget, the cost of which is included within Council Tax set by the Wiltshire County Council and Swindon Borough Council.

6. As part of its duties laid down in the Fire Services Act 2004, the Authority provides fire advice in the community. This means educating the public about fire safety.

7. The Wiltshire Fire & Rescue Service was established on 1 April 1997 following local government reorganisation. The Wiltshire County Council and Swindon Borough Council fund the Authority but are independent from it. Representative members of each council sit on the Authority, which then oversee the Fire Service's finances, strategies and operations.

### CLASSES OF INFORMATION CURRENTLY PUBLISHED

8. Tabled below are 'classes' of information held by the Wiltshire Fire & Rescue Service. The £ symbol indicates that a fee may be charged for the information, if the request is estimated to cost more than the set appropriate fee of £450.00. Please refer to Paras 14 to 18 of this publication for guidance on how costs are levied.

Class	Sub-Heading	Format of Information	Availability and cost
Operational – Fire Fighting and Rescue	<ul style="list-style-type: none"> <li>• Policies/Procedures.</li> <li>• Manuals – e.g. Major Incident Plans.</li>   <li>• Fire Cover Areas.</li> <li>• Vehicles/Appliances Equipment.</li> <li>• Special Services e.g. Pumping out flooded Premises.</li> </ul>	<p>Internal Documents.</p> <p>Internal Documents. Website. Maps/Plans.</p>	<p>On request to Information Officer, Cost: £</p> <p>On request to Information Officer. Cost: £ Website Cost: Free</p>
Personnel and Training *	<ul style="list-style-type: none"> <li>• Recruitment</li> <li>• Terms and Conditions.</li> <li>• Discipline Procedure.</li> <li>• Staff Appraisal. Policy.</li> <li>• Statistics.</li> <li>• Equal Opportunities.</li> <li>• Training Strategy.</li> <li>• Pension Information.</li> <li>• Operational Training Manuals.</li> <li>• Non-Uniformed (Excluding Personal Data)</li> <li>• Integrated Personnel Development System(IPDS).</li> </ul>	<p>Application Forms. Documents. Website.</p>	<p>Website. Cost: Free On request to Information Officer. Cost: £</p>

Occupational Health & Safety advice to Staff & public on Fire related issues.	<ul style="list-style-type: none"> <li>Occupational Health Advice.</li> <li>Risk Assessment evaluating risks to people</li> <li>Welfare</li> <li>Statistics</li> </ul>	Leaflets Website Documents	On request to Information Officer. Cost, Free Website: Cost, Free.
Managing the Service	<ul style="list-style-type: none"> <li>Guidance on Management.</li> <li>Policies and Procedures.</li> <li>Service Structure.</li> </ul>	Official Publications Website	On request to Information Officer. Cost: £ Website. Cost Free
Plans and Procedures	<ul style="list-style-type: none"> <li>Corporate Plan</li> <li>Best Value Plans</li> <li>Strategies e.g. Community Fire Safety</li> <li>Service Orders e.g. Dealing with burning vehicles.</li> <li>Service Plans</li> </ul>	Authority Reports Brochures Website CD ROM Internal Documents	On request to Information Officer. Cost: £ Website. Cost: Free CD ROM. Cost: £
Budgets	<ul style="list-style-type: none"> <li>Annual Budget</li> <li>Financial Summary</li> <li>Annual Statement of Accounts</li> </ul>	Authority Reports Website CD ROM Internal Documents	On request to Information Officer. Cost: Free. Website. Cost: Free
Premises (Location of Stations etc)	<ul style="list-style-type: none"> <li>Fire Stations</li> <li>Training Centres</li> <li>Headquarters</li> </ul>	Internal Documents Website	On request to information Officer. Cost: Free. Website. Cost: Free
Purchasing and supply	<ul style="list-style-type: none"> <li>Policy Statement</li> <li>Purchasing strategy</li> <li>Uniforms</li> <li>Stationary</li> <li>Operational Equipment</li> <li>Vehicles, Appliances &amp; Cars</li> <li>Smoke Alarms</li> </ul>	Website Internal Documents	On request to Information Officer. Cost: £. Website. Cost: Free
Information and Communication	<ul style="list-style-type: none"> <li>Equipment Software &amp; Hardware</li> </ul>	Internal Documents	On request to Information Officer. Cost: £
Public Relations	<ul style="list-style-type: none"> <li>News/Press Releases</li> <li>Incidents of Interest</li> <li>Complaints Procedure</li> <li>News Letters</li> </ul>	Internal Documents Website	On request to Information Officer. Cost: Free

<p>Fire Safety</p> <p>Community Fire Safety</p> <p>Technical Fire Safety &amp; Enforcement*</p>	<ul style="list-style-type: none"> <li>• Community Fire Safety Plan – how we promote Fire Safety.</li> <li>• Fire Safety at Home &amp; Community.</li> <li>• Fire Safety for Schools/Kids</li> <li>• Statistics</li> <li>• Fire Safety Campaign</li> <li>• Young Firefighters.</li> <li>• Commercial Fire Safety.</li> <li>• Policy and Procedure Guidance.</li> </ul>	<p>Leaflets Brochures Posters Stickers Manuals Internal Documents Website Video*</p>	<p>On request to Information Officer. Cost: Free Website Cost: Free</p> <p>On request to Information Officer. Cost: £</p>
<p>Performance</p>	<ul style="list-style-type: none"> <li>• Best Value Indicators.</li> <li>• Best Value Performance Plans &amp; Reviews.</li> <li>• Statistics.</li> <li>• Audit Reports.</li> <li>• HM Fire Service Inspection Reports</li> <li>• Performance Management.</li> </ul>	<p>Reports and Internal Documents CD ROM Website</p>	<p>On request to the Information Officer Cost: £. Website. Cost: Free CD ROM: Cost: £</p>
<p>Committees &amp; Partnerships</p>	<ul style="list-style-type: none"> <li>• Fire Authority/ Committees &amp; Panels.</li> <li>• Trades Union Liaison.</li> <li>• Management Board. (From Feb 03)</li> <li>• Equal Opportunities.</li> <li>• Local Partnership Agreements e.g. Smoke alarms</li> </ul>	<p>Agendas/Open Reports &amp; Minutes Handbooks Reports Brochures Website</p>	<p>Website. Cost: Free On request to the Information Officer. Cost: £</p>
<p>Emergency Planning.* Civil Defence.* Pipelines.* Radiological Emergencies.* Major Accident Hazards.*</p>	<ul style="list-style-type: none"> <li>• Control Of Major Accident Hazard Plans. Pipeline and Radiation Plan. Public Information Zone. (High Risk Areas)</li> </ul>	<p>Internal Documents</p>	<p>On request to the Information Officer. Cost:£</p>
<p>Service Museum/Historical Interest</p>	<p>Public Information.</p>	<p>Internal Documents</p>	<p>On request to the Information Officer. Cost: Free.</p>

\*Some Information might be Confidential or exempt from publication by law – therefore we cannot publish this\*

## INFORMATION AVAILABLE ON OUR WEBSITE

9. Wiltshire Fire & Rescue Service maintains a website at [www.wiltshire.gov.uk](http://www.wiltshire.gov.uk) and has an ongoing commitment to make as much information available on our website as possible.

10. Other useful website addresses containing the information you are looking for are also available from the following organisations or on their websites. The websites listed below are an excellent source of information and if the documents are downloaded or printed off by the enquirer they provide a quick response at little cost. However, The Wiltshire Fire & Rescue Service takes no responsibility nor warrants the accuracy of information contained on the following sites:

- a. Chief Fire Officers Association (CFOA)- [www.cfoa.org.uk](http://www.cfoa.org.uk)
- b. Office of The Deputy Prime Minister (ODPM). [www.communities.gov.uk/](http://www.communities.gov.uk/)
- c. UK online Government – <http://www.direct.gov.uk>
- d. Local Government Association (LGA) – [www.lga.gov.uk](http://www.lga.gov.uk)
- e. FireNet International – <http://www.fire.org.uk/>

## MAKING AN APPLICATION FOR OTHER INFORMATION TO THE WILTSHIRE AND SWINDON FIRE AUTHORITY

11. As well as being able to access information, which is publicly available under the Publication Scheme, we will answer queries under the existing Code of Practice on Access to Government Information. This allows you to write and ask us to supply you with specific information.

12. You can also apply for a copy of the personal data we hold about you under the Data Protection Act 1998. That is information relating to an applicant that has arisen through their employment with the Authority or information obtained about an individual through the Authority's statutory functions. There is a fee of £10.00 and you should contact or address your request to the

Information Rights Advisor  
Wiltshire Fire & Rescue Service  
Service Headquarters  
Manor House  
Potterne  
Wiltshire  
SN10 5PP

Telephone (01380 731170)

Email [enquiries@wiltshire.gov.uk](mailto:enquiries@wiltshire.gov.uk)

## APPLICATIONS FOR INFORMATION UNDER FOIA

13. You will be able to ask the Authority for information, which is neither already published elsewhere nor exempt under the FOIA. Under the FOIA you will have the right to ask for information to be provided in a particular way and we will try to meet your request. You will be able to ask for assistance if you have any difficulty in formulating or making an application by contacting the Authority's Information Officer. We will help you as much as possible but we are not required to look for the information you request unless we have:

- a. A clear and understandable request with enough detail to locate the information.
- b. Your name and address so we can respond to your request
- c. An indication about the form in which you want the information.

14. This will ensure that your application is dealt with as quickly as possible. You should give as much detail as you can in order to assist us in locating the information that you require. If we are prevented by law or for other legal reasons e.g. (Confidentiality) from giving you the information you have asked for we will tell you. Some documents may include exempt information so you will only get the information, which is not exempt. You only have the right to information and not necessarily to documents.

16. Information supplied will be free of charge up to the set appropriate amount of £450.00. If it is estimated that your request would exceed this amount then any fee charged will be calculated by looking at the costs directly and reasonably incurred locating the information you have asked for and giving it to you. You will then be sent a 'fees notice' which you will have to pay within 3 months of your request. You will not receive information until you have paid the costs in the fees notice.

17. If the estimated cost of providing the information would be above the appropriate limit set by the government then we will not be under a duty to provide the information. However, the Authority will inform you if the limit will be exceeded and we will try to let you know what can be provided within the limit. Despite not being obliged to provide Information, which exceeds the limit, the Authority will still be under a duty to advise and assist.

18. In order to protect the Authority there will be rules, which govern multiple applications for information, which are clearly trying to avoid the financial limits set by the government. However, we will try to help you as much as possible to get the information you want.

## COMPLAINTS AND FEEDBACK

19. Wiltshire Fire & Rescue Service has a formal complaint procedure. If you wish to make a complaint about this publication scheme, you may do so verbally or in writing, by addressing a complaint to:

Director, People  
Service Headquarters  
Manor House  
Potterne  
Devizes  
Wiltshire SN10 5PP

Telephone 01380 731146.

All complaints relating to this scheme will be investigated independently by the clerk to the Wiltshire Fire & Rescue Service.

20. If you are not satisfied with the assistance that you get from the Authority or if we have not been able to resolve your complaint and you feel that a formal complaint needs to be made then this should be addressed to the office of the Information Commissioner. This is the organisation that ensures compliance with the Freedom of Information Act 2000 and that deals with formal complaints. They can be contacted at:

- a. Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF
- b. Enquiry/Information Line: 01625 545745  
Email: [mail@ico.gsi.gov.uk](mailto:mail@ico.gsi.gov.uk)

**This document will be made available in other languages, large print, braille or audiocassette upon request**

## Appendix 2

### Exempt Information and Legislation Referring

This guidance has been taken from the Freedom of Information Act. Where the words in brackets say “public interest test” it means that the matter can only be disclosed after the public interest test has been applied and you have decided that the public interest in disclosing the information outweighs any public interest in not doing so. (See Appendix 3). Where the word in brackets is “absolute” it means that disclosure must be refused. If you are faced with cases that you’re not sure about, the Service’s Information Rights Advisor will be able to put you in touch with someone who can help you.

#### **Information available to the applicant by other means (absolute) under Section 21.**

For example, information:

- which the Wiltshire Fire & Rescue Service is required by law to communicate
- which is published in the context of the Authority’s publication scheme
- which is ‘reasonably’ accessible to the applicant.

#### **Information intended for future publication (public interest test) under Section 22.**

This applies where publication was planned at the time the request was made.

#### **Information supplied by or relating to bodies dealing with security matters (absolute) under Section 23.**

This only applies to information supplied by or relating to one of the security bodies listed in the section.

#### **National security (public interest test) under Section 24.**

Information that is not covered by Section 23 but exemption is needed to safeguard national security.

#### **Defence (public interest test) Section 26**

Information likely to prejudice national defence or the armed services

#### **International relations (public interest test) under Section 27.**

Information likely to prejudice the U.K’s international relations or interests.

#### **Relations within the United Kingdom (public interest test) under Section 28.**

Information likely to prejudice relations between U.K. administrations: the U.K. Government, the National Assembly for Wales, the Scottish administration and the executive committee of the Northern Ireland Assembly.

#### **The economy (public interest test) under Section 29.**

Information likely to prejudice the economic interests of the U.K. or part of the U.K. or the financial interests of the government or any of the national administrations in the U.K.

**Investigations and proceedings conducted by public authorities (public interest test) under Section 30.**

Information held for the purpose of criminal investigations and proceedings and information obtained from confidential sources relating to these or civil proceedings arising out of them.

**Law enforcement (public interest test) under Section 31.**

Information not covered by Section 30 above and which is likely to prejudice a wider range of investigations and conduct, including prevention of crime; assessment and collection of any tax; regulatory enforcement, health and safety; any civil proceedings.

**Court Records (absolute) under Section 32.**

Information that is only held as part of the documentation for a court or tribunal case or a statutory inquiry.

**Audit (public interest test) under Section 33.**

Applies to information held by public authorities which have functions relating to audit or examining the economy, efficiency and effectiveness of the use of resources of other public authorities; information is exempt if disclosure is likely to prejudice those functions.

**Parliamentary privilege (absolute) under Section 34.****Formulation of government policy (public interest test) under Section 35.**

Information held by a government department or the National Assembly for Wales, relating to the formulation of government policy.

**Prejudice to the effective conduct of public affairs (absolute for information held by either House of Parliament; for all other information covered by this section (public interest test) under Section 36.**

This section applies to information held by any public authority. However with the exception of statistical information, a 'qualified' person is required to operate the exemption. For authorities not listed in this section, including local authorities in England and Wales, this is either a minister of the Crown or someone authorised for this purpose by a minister.

**Communication with Her Majesty etc and honours (public interest test) under Section 37.**

This applies to information that relates to communications with Her Majesty, member of the Royal Family or Royal Household, or the conferring of honours.

**Health and Safety (public interest test) under Section 38.**

Information that would or would be likely to, endanger the physical or mental health or safety of any individual.

**Environmental information (public interest test) under Section 39.**

Environmental information does not fall within the Freedom of Information Act if it must be released in accordance with Environmental Information Regulations, which will be introduced to implement the Aarhus Convention. However, if the information were subject to a discretionary exemption under the environmental regulations, then the Freedom of Information Act public interest test would apply.

**Personal information (absolute exemption for subject access requests and in certain other situations; the public interest test applies to third party requests) under Section 40.**

This section operates as a gateway to the Data Protection Act 1998. Subject access requests are decided under the term of the Data Protection Act. Third party requests for personal information are decided in accordance with the data protection principles, but within the framework of the Freedom of Information Act.

**Information provided in confidence (absolute) under Section 41.**

This exemption applies where disclosure would constitute an actionable breach of confidence.

**Legal professional privilege (public interest test) under Section 42.**

This exemption applies where a claim to legal professional privilege could be maintained in legal proceedings.

**Commercial interests (public interest test) under Section 43.**

This exemption applies to trade secrets and to information which, if disclosed, would or would be likely to, prejudice the commercial interests of any person, including the authority holding it.

**Legal prohibitions on disclosure (absolute) under Section 44.**

Information, the disclosure of which is prohibited by any other enactment, is incompatible with any community obligation, or would be a contempt of court.

## Appendix 3

### Public Interest Test

1. This really means having a look at what the information is about and making a decision as to whether the best interests of the public would be served if disclosure were made. You need to look very closely at the content and discuss the matter with your Information Manager or Information Officer. Further assistance can be obtained from the Clerk to the Authority or the Authority's legal advisor.
2. If you decide that the public interest in disclosing outweighs that of not doing so then disclosure can be made.
3. It is advisable to keep a full record of how the decision to disclose or refuse was made. This account should be placed on the Wiltshire Fire & Rescue Service Information Act main file. This is held by the Wiltshire Fire & Rescue Service's Information Officer.
4. You may find the Data Protection Code of Practice on Processing a Data Subject Access Request gives you further guidance on this.

The same rule applies here, STOP, THINK and JUSTIFY your reasons.