

17 August 2026

Your request for information

Thank you for your email of 24 July 2026 where you requested information relating to the CMA's organisational structure and information management arrangements.

The CMA is treating your request under the Freedom of Information Act 2000 ('FOIA'). The details of your request and the CMA's response are set out below.

The CMA's response

1. A list of all directorates, divisions, departments, units, teams, offices or other business areas that form part of the Competition and Markets Authority

The information requested at question 1 of your request is exempt from disclosure under section 21 FOIA as it is reasonably accessible to you by other means. Information about the CMA's organisational structure is in the public domain and can be viewed on its website at the following links:

- [Publication scheme - Competition and Markets Authority - GOV.UK](#) – please refer to the ‘Who we are and what we do’ section which provides detailed information on the CMA’s organisational structure, management team, offices and governance.
- [Annual Report and Accounts 2025 to 2026 - GOV.UK](#) - in particular, please refer to the corporate governance report which provides an overview of the CMA’s main functions (pages 71-72).

- 2. For each area identified, please provide:**
- The official name.
 - A brief description of its responsibilities.
 - The senior responsible officer (job title only).
 - The Information Asset Owner, business owner or equivalent person responsible for the information held by that area (job title only, where available).

Please refer to our response at Question 1 above. For information relating to Information Asset Owners, please refer to our response at Question 5 below.

- 3. For each directorate, division or business area, please provide a list or description of the information assets for which it is responsible, including but not limited to:**
- Databases.
 - Registers.
 - Case management systems.
 - Document management systems.
 - Searchable electronic records.
 - Information repositories.
 - Any other searchable information systems used in the course of its functions.
- 4. For each information asset or system identified, please state, where held:**
- The name of the system or information asset.
 - Its purpose.
 - The business area responsible for maintaining it.
 - Whether it is electronically searchable.
 - Whether staff are able to search the information held within that system.
- 5. Please provide a copy of your current Information Asset Register (IAR). If disclosure of the complete register is considered exempt, please instead provide a schedule listing:**
- The name of each information asset.
 - The responsible business area.
 - The Information Asset Owner (job title only).

The CMA confirms that it holds information falling within the scope of Questions 3 to 5. Please find enclosed a redacted extract of the CMA's Information Asset Register.

However, the detailed information requested at Questions 3 and 4, together with the remaining information held within the Information Asset Register, is exempt from disclosure under sections 31(1)(a) and 31(1)(g) of FOIA.

Section 31(1)(a) FOIA

Section 31(1)(a) of FOIA exempts information where disclosure would or would be likely to prejudice the prevention or detection of crime.

The CMA considers that disclosure of the requested information would prejudice the prevention or detection of crime. Disclosure would reveal a comprehensive picture of the CMA's information environment, including the systems used across the organisation to store, manage and retrieve information.

The CMA considers that this information would be of value to malicious actors seeking to target the CMA's systems through cyber-attacks or other forms of unauthorised access. Disclosure would provide greater insight into the CMA's information architecture and increase the vulnerability of its systems to criminal activity. Accordingly, the CMA considers that disclosure would prejudice the prevention or detection of crime.

Section 31(1)(g) FOIA

Section 31(1)(g) of FOIA exempts information where disclosure would or would be likely to prejudice the exercise by a public authority of its functions for the purposes set out in section 31(2) of FOIA.

Specifically, these functions are exercised for the purposes set out in section 31(2) of FOIA, namely:

- a) ascertaining whether any person has failed to comply with the law;
- b) ascertaining whether any person is responsible for any conduct which is improper;
- c) ascertaining whether circumstances which would justify regulatory action in pursuance of any enactment exist or may arise.

The CMA considers that releasing the requested details would prejudice the CMA's operational effectiveness in carrying out these functions. Taken together, the requested information would reveal detailed information about the CMA's information assets and systems and could expose the CMA to increased cyber security risks by revealing specific systems and information assets in use, which could in turn be exploited by malicious actors.

This would increase the risk of disruption to, or compromise of, systems used to support the CMA's regulatory and enforcement activities, thereby prejudicing the CMA's ability to carry out its statutory functions effectively.

The Public Interest Test

Section 31 of FOIA is subject to the public interest test. We have therefore considered the public interest in disclosure and the public interest in maintaining the exemption.

The CMA recognises the public interest in openness and transparency regarding the information it holds and how it manages that information.

However, there is a substantial public interest in protecting the security of the CMA's systems and preventing information from being disclosed in a way that

could assist those seeking to conduct cyber-attacks or otherwise compromise those systems. Further, there is a significant public interest in ensuring that the CMA can exercise its statutory functions effectively and securely.

The CMA considers that the public interest in maintaining the exemptions outweighs the public interest in disclosure.

6. Please provide a list of all executive agencies, arm's-length bodies, advisory bodies, public bodies or other organisations sponsored by, accountable to, or reporting through the Attorney General's Office, together with a brief description of their responsibilities.

We note that Question 6 refers to organisations sponsored by, accountable to, or reporting through the Attorney General's Office. As the CMA is neither sponsored by nor accountable to the Attorney General's Office, we have interpreted this request as asking for information relating to the CMA.

The CMA does not hold information falling within the scope of your request. By way of explanation, the CMA does not sponsor, oversee or have executive agencies, arm's-length bodies or advisory bodies reporting through it in the manner described in your request.

The CMA is a non-ministerial government department responsible for promoting competition for the benefit of consumers and enforcing competition and consumer protection legislation in the UK. The CMA is sponsored by the Department for Business, Innovation, Science and Trade.

7. Please provide details of your Freedom of Information process, including:

- o **The business area responsible for coordinating FOI requests.**
- o **Whether searches are coordinated centrally or by individual business areas.**
- o **How requests are allocated to relevant teams for searches.**

Please find enclosed the CMA's FOI process document which provides information on the CMA's FOI process and guidance for staff.

Please note that any personal data of staff below Senior Civil Service level has been redacted under section 40(2) of FOIA.

Section 40(2) of FOIA exempts third-party personal data from disclosure if disclosure would, among other things, contravene one of the data protection principles in Article 5(1) of the UK General Data Protection Regulation and section 34(1) of the Data Protection Act 2018.

In this case, the CMA considers that disclosure of the personal data of staff members at grades AO – G6 would contravene the first data protection principle. This principle provides that the processing of personal data must be lawful, fair and transparent. The CMA has considered the legitimate interests in disclosure and has found on balance that there is no overriding legitimate interest or necessity in disclosure that overrides the reasonable expectations of privacy of the individuals concerned.

Section 40(2) of FOIA is an absolute exemption, and the CMA is not obliged to consider whether the public interest favours disclosing the information.

Internal review process

If you do not accept the outcome of your request for information, you may seek an internal review of the CMA's decision by emailing internalreview@cma.gov.uk. If you do not seek an internal review within 40 calendar days of the date of the CMA's response to you the CMA will not be obliged to offer a review of your request outside this timeframe.

In requesting an internal review, please provide your reasons why you believe your request for information should be considered afresh by the CMA. Your reasons will assist the reviewer in addressing your concerns about how your request was handled.

The CMA will aim to deal with your request for a review within 20 working days of receipt.

You are also entitled to complain to the Information Commissioner, but the Commissioner may ask you to complete the CMA's internal review process before taking on your complaint. You can contact the Information Commissioner by visiting www.ico.org.uk/global/contact-us, or by email at casework@ico.org.uk

Yours sincerely

Information Governance Team

InformationGovernanceTeam@cma.gov.uk