

**From:** EIR Compliance

**To:**

**Subject:** 20251002- EIR – Internal review response

**Date:** 02 October 2025 14:15:00

**EIR Reference: EIR**

We refer to your email dated 18 August 2025 in relation to our response to EIR.

We have logged your internal review reference as EIR.

**Original request:**

On 18 July 2025 you requested information for:

*"We have recently seen a plan that shows the Reservoir that provides High Bentham water is Embsay Reservoir, however the plan also shows Service Reservoirs at Cold Coates (notation) Cold Cotes /SRE, Clapham Treated Water Pump and Clapham SRE.*

*The Key designates CRE/SRE as Service Reservoir, can you confirm whether these are an above ground or a below ground (SRE) Service Reservoir and their locations (using what three words or OS Map references)."*

**Our response to EIR:**

We responded to EIR on the 14 August 2025 and applied exemption 12(5)(a) a public authority may refuse to disclose information to the extent that its disclosure would adversely affect international relations, defence, national security or public safety.

**Your request for an internal review EIR:**

You contacted us on the 18 August 2025 to request an internal review and raised the following points for our consideration:

*"We reject the claim that you cannot answer due to "National Security" as this is already in the public domain as Privately run Water Companies like Yorkshire Water used to be nationalised Water Authorities. We received the following schematics of Yorkshire Waters System via a public medium and therefore the information is already public knowledge."*

**Internal review response EIR:**

We have undertaken a review of your original request for information and the internal request, taking into considerations the comments you made at the point of submitting your internal review.

In considering your original request, it came to our attention that the information you have seen was inadvertently published online. The fact that information has previously been made public does not, of itself, mean that it is no longer protected under the EIR. The ICO's guidance recognises that where information was published in error, the public authority may continue to rely on the exemption if disclosure would now cause the adverse effects described in regulation 12(5)(a). We have considered whether further disclosure at this time would pose a real and significant risk to the interests protected by regulation 12(5)(a), such as public safety or national security.

In using the information available online you have asked us to specifically confirm where the key designates a CRE/SRE as a service reservoir, if we can confirm if these are above ground or below ground service reservoirs and their locations using what three words OS Map references. Service reservoirs are critical infrastructure in relation to the supply of drinking water. The confirmation and publication of their exact locations present security and public safety considerations:

- Target for malicious actors/ unauthorised access: to publicly confirm the location of drinking water reservoirs increases the risk of sabotage, vandalism or terrorism and allows for unauthorised third party access.
- The above in turn could result in the risk of contamination to the water supply which would pose a significant risk to the public.

Organisations such as Yorkshire Water are required to exercise caution and adhere to all relevant regulatory and industry guidance when considering disclosures in relation to service reservoirs to ensure that we can prioritise the protection of the public and maintain critical water infrastructure.

Our assessment concludes that, despite the prior publication, disclosure would still be likely to adversely affect these interests. For this reason, we do not wish to further disclose information that should not be in the public domain.

Therefore, with regards to our response to EIR and the application of exemption Regulation 12(5)(a) we have made a decision to uphold the exemption we had originally applied. Whilst we appreciate it would be beneficial to obtain this data we have to consider the wider public interest in disclosure, based on this. It is our belief that disclosing information could potentially pose a risk to national

security. This is because safeguarding national security includes the protection of potential targets, even if there is no evidence that an attack is imminent. The information you have requested may form part of the Critical National Infrastructure (CNI) of this country and could be perceived as a potential target for such an attack. In addition to this, we also have to consider the guidance issued to us by DEFRA on what we can make available in the public domain in relation to Critical National Infrastructure (CNI). We recognise the importance of transparency and accountability, and we have carefully considered whether the public interest in disclosure outweighs the potential harm. However, we believe that in this case, the public interest in maintaining the exemption outweighs the public interest in disclosure. The potential risks associated with releasing the information are too significant to justify its disclosure, as such we will not be disclosing the information to you.

If you are not satisfied with the outcome of the internal review you have the right of appeal to the Information Commissioner who can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Web: <http://www.ico.org.uk>

Thank you for contacting Yorkshire Water.

Yours sincerely,

Data Protection Team

Email: [EIR@Yorkshirewater.co.uk](mailto:EIR@Yorkshirewater.co.uk)