



Coventry City Council

Information Governance Team

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Dear Sir/Madam

**Freedom of Information Act 2000 (FOIA)**

**Request ID: FOI771878398**

Thank you for your request for information relating to User authentication for citizen-facing online services.

You have requested the following information:

**This request is made under the Freedom of Information Act 2000 and relates only to citizen-facing online services (for example, housing portals, council tax accounts, or benefits portals). It does not concern internal staff systems or administrative tools. The research does involve information on detailed technical configurations for public-facing web portals. Please provide the following information/documents:**

- 1. A copy of (or extract from) your current policy that governs user authentication for citizen-facing online services.**
- 2. The specific password rules that apply when citizens create an account or perform a password reset. For example, password character minimum and maximum limits, special character enforcement.**
- 3. Whether MFA is offered or required for citizen-facing services, and, if so, what types are supported (e.g. SMS, email, or authenticator app).**
- 4. A brief description or document outlining how password resets or account recovery are handled for public users (e.g. email verification, security questions, or other processes).**
- 5. The date these policies were last reviewed or updated, and whether the policies align with any national or international guidance (e.g. NCSC, NIST SP 800-63, or ISO 27001).**

**Please also find attached a Participant Information Sheet titled “Participant Information Sheet” which explains in detail what data is being gathered, how it will be stored, how it will**

**be processed, how it will be destroyed, and the process if any personal or sensitive information is received or found.**

The Council under Section 31(3) neither confirms nor denies whether the information you have requested exists or is held by us.

The information you have requested is exempt from disclosure under Section 31(1)(a) and Section 31 (3) of the FOIA Act 2000. Section 31 of the FOIA relates to Law Enforcement and Section 31(3) removes the public authority's duty to confirm or deny whether information is held if to do so would, or would be likely to prejudice law enforcement.

It is the Council's view that the confirmation or denial of the possession of information relating to user authentication for citizen-facing online services and password rules etc. would be likely to compromise the Council's information security strategies by giving cyber criminals/criminals insight into vulnerabilities which may, or may not, exist. A disclosure made under FOI is viewed as a disclosure to the world at large hence, criminals could use this information to impersonate and compromise accounts of residents.

Section 31(3) is a qualified exemption, as such we have gone on to perform a public interest test in order to assess the public interest arguments for and against declaring whether or not the requested information is held.

For Disclosure:

- Confirmation of possession would demonstrate a commitment to transparency with regard to the Council's undertaking and could provide assurance that the council have robust IT infrastructure and processes in place.

Against Disclosure:

- Maintaining the integrity and security of the Council's systems.
- Preventing cyber-attacks and similar crimes against the Council systems.
- To prevent criminals using this information to commit fraud of residents

Revealing the information may assist a criminal's insight into not only the strengths of the Council's security and systems, but also any potential weaknesses that may exist. This could ultimately result in a future attack or crimes. We can advise that measures are in place to protect the integrity of personal and sensitive personal information.

On balance the public interest in maintaining the exemption outweighs that in confirming or denying whether information is held and therefore the Council neither confirms nor denies, whether this information is held.

For information, we publish a variety of information such as: [FOI/EIR Disclosure Log](#), [Publication Scheme](#), [Facts about Coventry](#) and [Open Data](#) that you may find of useful if you are looking for information in the future.

If you are unhappy with the handling of your request, you can ask us to review our response. Requests for reviews should be submitted within 40 days of the date of receipt of our response to your original request – email: [infogov@coventry.gov.uk](mailto:infogov@coventry.gov.uk)

If you are unhappy with the outcome of our review, you can write to the Information Commissioner, who can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or email [icocasework@ico.org.uk](mailto:icocasework@ico.org.uk).

Please remember to quote the reference number above in your response.

Yours faithfully

**Information Governance**