Breach Insights Call for Views: ICO response to stakeholder engagement

We welcome all comments made in response to our Call for Views about our breach reporting data. The responses received show us that people want to see more data for a range of reasons. We also note the concerns people have about the quality of the data, and of ensuring that organisations are not discouraged from reporting breaches.

We aim to publish the majority of the categories of data we asked about in the survey. However, we have decided not to publish the names or locations of organisations.

Under our legal obligations we have to ensure that any information we publish about organisations is in the public interest. The location of an organisation was not seen as useful by respondents, with more people saying that it was 'not useful' or 'not at all useful' than 'useful' or 'very useful'. This indicates that it would not be in the public interest to publish this information.

Although the name of the organisation received more than 50% responses of 'useful' or 'very useful', we have to balance this against the concerns raised about how this would affect organisations reporting breaches to us. For this reason we have decided not to publish this information. It is worth noting, however, that we also proactively publish a separate "complaints and concerns" dataset, which includes the names of organisations that report breaches to us.

We note the level of detail that has been requested for the date, type of data, type of data subject and case decision. We will use the favoured levels of detail within the updated dashboard. We will also use groupings for the number of data subjects affected and time taken to report breach rather than giving the exact figure. This is to further reduce the risk of an organisation being identified through this data.

We note the comments and requests for further additions to the dashboard. The categories of data we asked about in the Call for Views are those details we already collect when a breach is reported to us. At present technical limitations prevent us from adding any further categories of data. However, we keep this under review and these requests will be considered when changes are made to the process in the future.

Finally, the summary page for the dashboard will be updated to ensure definitions and trend details are easily accessible. It is important to us that the data we publish is useful and relevant.