

14 September 2023

IC-255053-H8D2

Request

You asked us:

"Please could you provide me with the attached information about your organisation's ICT expenditure. Please include expenditure for the period April to March (or closest period based on your financial year). Please enter in £s, not £000s or £ms. Please include revenue and capital expenditure, if possible."

We received your request on 29 August 2023.

We have handled your request under the Freedom of Information Act 2000 (the FOIA).

Our response

We can confirm that we hold information in scope of your request, we have completed the table that you provided for the 2022/2023 financial year below.

Item	Notes	2022/23	Comments
Business Intelligence Applications	<i>Examples: Tableau, Microsoft Power BI</i>		Power BI part of Microsoft Enterprise Agreement
CRM Applications	<i>Software for managing relationships with customers</i>	Exempt	Microsoft Dynamics licensing costs. Exempt - see below for further information.
ERP Applications	<i>Integrated finance <u>and</u> HR software - examples: SAP and Oracle</i>	£0	Workday in project and not implemented until April 2023

Finance Applications	<i>Software for accounting or payments</i>	£17,353	
HR Applications	<i>Software for payroll or personnel management</i>	£65,786	
Operating Systems	<i>Example: Windows</i>	£62,669	
Security Software	<i>Includes anti-virus, anti-malware, spam filters, etc.</i>	Exempt	See below for further information.
Other Applications	<i>All other software not covered above</i>	£1,777,095	All other software applications/licensing including ETLA.

Withheld information

We have recently responded to a request for the cost of our CRM systems on 30 August 2023, please see the response which has been published here: [IC-246846-X8M9 | ICO](#). This information is exempt under section 43 of the FOIA for the reasons outlined within this response.

We are also withholding the total money spent on our security software under section 31 of the FOIA. Section 31(a) states that we can withhold information where disclosure:

*"would, or would be likely to, prejudice—
(a) the prevention or detection of crime,"*

Section 31 is not an absolute exemption, and we must consider the prejudice or harm which may be caused by disclosure.

Disclosing the ICO's expenditure on security software may lead to an insecure assessment of the extent and capability of the ICO's IT security. These figures may be compared against the figures of other organisations, or other held or known information, and may present an impression of comparative security weaknesses. Similarly, disclosing the names and details of our specific security software products is a cyber security risk. Attackers could use this information to target the ICO and attempt to access, re-configure or undermine our security systems.

We must also carry out a public interest test to weigh up the factors in favour of disclosure and those against. With this in mind, we have then considered the public interest test for and against disclosure.

In this case the public interest factors in disclosing the information are –

- increased transparency about the ICO's financial commitments to IT security;
- increased assurance about the ICO's IT security and protection of its systems and data.

The factors withholding the information are:

- the public interest in the ICO avoiding the risk of compromising protection of personal data of the general public and other individuals, in accordance with our approach to security in our [Risk Management Policy and Appetite Statement](#) (page 10, paragraph (e));
- the public interest in the ICO staying in control of its IT systems so it can effectively monitor, manage and respond to cyber threats and issues;
- the public interest in the ICO maintaining secure IT platforms, to enable individuals and organisations to safely and effectively engage with and receive important communications from the ICO.

Having considered all of these factors we have taken the decision that the public interest in withholding the information outweighs the public interest in disclosing it. We are therefore unable to disclose the money spent on our security systems, or the name of these systems.

This concludes our response to your request.

Next steps

You can ask us to review our response. Please let us know in writing if you want us to carry out a review. Please do so within 40 working days.

You can read a copy of our full review procedure [here](#).

If we perform a review but you are still dissatisfied, you can complain to the ICO as regulator of the FOIA. This complaint will be handled just like a complaint made to the ICO about any other public authority.

You can [raise a complaint through our website](#).

Your information

Our [Privacy notice](#) explains what we do with the personal data you provide to us, and set out your rights. Our retention schedule can be found [here](#).

Yours sincerely,



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