

14 March 2024

IC-291675-P9H8

Request

You asked us:

Statistics on Incidents Involving Vulnerable Individuals:

- *Number of reported data breaches affecting vulnerable individuals.*
- *Cases of unauthorised access to personal data of vulnerable populations.*

Guidelines and Policies:

- *ICO's policies or guidance on protecting data of vulnerable individuals.*
- *Best practices recommended by the ICO for organisations handling data of vulnerable populations.*

Awareness and Training Programs:

- *Initiatives or programs aimed at raising awareness about the data protection rights of vulnerable individuals.*
- *Training materials for organisations on safeguarding the personal data of vulnerable groups.*

Regulatory Actions:

- *Examples of enforcement actions taken against entities failing to protect the data of vulnerable individuals.*
- *Summaries of investigations related to the misuse or improper handling of vulnerable individuals' data.*

Collaborations and Partnerships:

- *Information on partnerships or collaborations with other organisations or sectors to enhance data protection for vulnerable groups.*
- *Joint initiatives with tech companies or industry groups focused on improving data security for vulnerable individuals.*

Innovative Practices and Technologies:

- *Examples of innovative practices or technologies recommended or endorsed by the ICO to protect vulnerable individuals' data.*
- *Case studies or research on effective data protection strategies for vulnerable populations.*

Future Directions and Recommendations:

- *Insights into future ICO initiatives to enhance data protection for vulnerable individuals.*
- *Recommendations for tech companies on incorporating considerations for vulnerable populations in their data protection strategies*

We received your request on 4 March.

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

Our response

We do hold information within the scope of your request, but confirm that locating the full extent of the information requested would breach the cost limit envisaged by section 12 of the FOIA.

Section 12 of the FOIA makes clear that a public authority is not obliged to comply with an FOIA request if the authority estimates that the cost of complying with the request would exceed the 'appropriate limit'.

The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 stipulates that the 'appropriate limit' for the ICO is £450. We have determined that £450 would equate to 18 hours work.

Under our current strategy [ICO25](#), safeguarding and empowering vulnerable groups is one of our core objectives, which runs through all elements of the ICO's work. As this is the case, vast amounts of information which could be said to fall within the scope of your very broadly phrased request is likely to be held by departments across the ICO, from policy work to individual complaints and data breach cases and many of our investigations files. The searches involved would therefore extend far in excess of the 18 hours of searching which would hit the limit in s.12.

It appears that you probably did not intend to request copies of all pieces of information falling under the themes that you have mentioned, and were more looking for examples or short summaries of this type of work, but the FOIA is designed for requesting copies of specific recorded information and so it would be difficult to respond to your request in this way as it would involve subjective consideration of what areas of work fall within your area of interest and choosing examples that are of interest to you. Additionally, even if we were to provide a summary in response to each of your questions, this would be a difficult and lengthy task due to the breadth of your questions.

It would be difficult, for example to determine which data breach cases effected vulnerable people, as there are a number of ways to assess vulnerability. When data breaches are assessed, there is a question about the types of data subjects effected and there are a number of categories to choose from, which include 'vulnerable adults' and 'children' and some other categories such as 'employees', so we can see how many reports have been submitted which include the group 'vulnerable adults' but this does not mean that data subjects falling under other categories may not also be classed as vulnerable.

In case this is of use to you I can advise that we currently hold record of 2494 personal data breach reports having been received, in which the effected Data Subjects included the category of 'vulnerable adults', and that 340 of those listed the incident type of 'unauthorised access'. This does not represent every report we have ever received, just those that we hold record of now, as this information is deleted in line with our retention schedules.

If you have a look at [this page](#) on our website, you can find details of all of the fines we have issued and other types of regulatory action that we have taken, and this includes information about the types of individuals effected so you can review and determine which ones of are interest to you.

In order to assist you, I have therefore provided a list of links below to information which we believe will be of interest to you and can give you an idea of the work the ICO is doing in this area. Please have a look at the information available and consider where there areas that you would like more information and if necessary come back to us with a further request, being more specific about the types of recorded information that you would like to see.

[ICO takes action against companies over predatory marketing calls targeting elderly, vulnerable people | ICO](#)

[ICO finds the Home Office's pilot of GPS electronic monitoring of migrants breached UK data protection law | ICO](#)

[Supporting the right of access for people with experience of the care system in Scotland | ICO](#)

[Children and the UK GDPR | ICO](#)

[Data sharing: a code of practice | ICO:](#)

[Data sharing in an urgent situation or in an emergency | ICO](#)

[UK Information Commissioner sets out focus on empowering people through information | ICO](#)

[Case studies and examples | ICO](#)

[How should we draft our privacy information? | ICO](#)

[ICO reassures employers they can share staff data in a mental health emergency | ICO](#)

[commissioners-opinion-whos-under-investigation-20220531.pdf \(ico.org.uk\)](#)

This concludes our response.

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](#) on our website.

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 sets out [your rights](#). Our [Retention and Disposal Policy](#) details how long we keep information.

Yours sincerely



Information Access Team
Strategic Planning and Transformation
Information Commissioner's Office, Wycliffe House, Water
Lane, Wilmslow, Cheshire SK9 5AF
ico.org.uk twitter.com/iconews
Please consider the environment before printing this email
**For information about what we do with personal data
see our [privacy notice](#)**