

By email

2 October 2023

Case reference: IC-255403-F022

We are now in a position to respond to your information request.

Request

"Please could you provide copies of the five DPIAs most recently completed by the ICO. If any of these are exempt for any reason please provide the five most recent DPIAs which you are able to release."

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

Our response

We can confirm we hold information within scope of your request.

Data protection impact assessments (DPIAs) are documents that are subject to review and are updated as required. We have interpreted your request for the 'most recently completed' to be the date they were signed off by the relevant ICO information asset owner. Enclosed are the five DPIAs with the most recent signed off date.

These DPIAs are as follows:

- PACE fertility and menstruation apps: Understanding the user experience of fertility and menstruation apps. (Third party led research)
- Understanding the user experience of fertility and menstruation apps. (ICO website survey)
- Offsite archive storage and integrated services: OASIS

- Onboarding checks at case officer assessment centres
- Slido: For interactive events

Please note, the 'Slido: For interactive events' (Slido) DPIA is marked as draft but has been completed.

We have redacted some of the information in the Slido and 'Offsite archive storage and integrated services: OASIS' (OASIS) DPIAs and further details are provided below.

Section 40 FOIA

We have redacted some information in the Slido DPIA under section 40(2) by virtue of section 40(3)(a)(i), which is the exemption under FOIA concerning third party personal information. You can find further information on our employee disclosure policy online [here](#).

Section 43 FOIA

Some of the information contained within the OASIS DPIA has been withheld under section 43 of the FOIA, which exempts information which could prejudice commercial interests. We consider the disclosure of this information would be likely to prejudice the commercial interests of OASIS (Offsite Archive Storage and Integrated Services Ltd).

The ICO's guidance on what constitutes a commercial interest states that: "A commercial interest relates to a person's ability to participate competitively in a commercial activity."

Section 43 of the FOIA states:

"Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it)."

OASIS is a commercial organisation who need to attract clients to ensure their viability. We consider that the disclosure of the information covered by this exemption would give an unfair advantage to their competitors which would prejudice their ability to attract new clients.

This is a qualified exemption and requires that we carry out a public interest test.

In this particular case, we consider that the factors in favour of disclosing this information are:

- Promoting accountability and transparency in the services being provided to the ICO by an external organisation, which involves the expenditure of public funds.

The factors for maintaining the exemption and withholding the information are:

- Disclosure of details of the services to be provided to the ICO as part of the tendering process, would be likely to prejudice the competitive and commercial activities of the external organisation in their respective market area.
- Prejudice to OASIS' commercial interest by affecting their ability to attract new clients by disclosing information to the public which is usually only available to clients of the organisation.
- Organisations would likely be discouraged from submitted tendering bids to the ICO if information provided in confidence, or considered to be confidential, were to be disclosed which they consider may damage their commercial interests.

We consider that in the circumstances, the public interest in maintaining the exemption outweighs the public interest in disclosing this information.

Published information

We have disclosed a number of ICO DPIAs on our disclosure log which may be of interest to you. The relevant links are provided below.

[IC-219053-S3Q7](#)
[IC-203321-W1K8](#)
[IC-164194-P6L6](#)

This concludes our response to your request. We hope you found this information helpful.

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



Information Access Team
Risk and Governance Department, Corporate Strategy and
Planning Service
Information Commissioner's Office, Wycliffe House, Water
Lane, Wilmslow, Cheshire SK9 5AF
ico.org.uk twitter.com/iconews

**For information about what we do with personal data
see our [privacy notice](#)**