

24 April 2024

Case Reference IC-296058-Z7H8

Your request

You asked us for the following:

"Please provide the total cost of the People Like Us event hosted by the ICO on 14 March.

<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.eventbrite.co.uk%2Fpeople-like-us-a-celebration-of- racially-diverse-media-and-marcomms-pros-tickets-837547807037&data=05%7C02%7Cicoaccessinformation%40ico.org.uk%7C3a3677cbfbf548c7870508dc4c946167%7C501293238fab4000adc1c4cfefba21e6%7C0%7C0%7C638469447385602304%7CUnknown%7CTWFpbGZsb3d8eyJWIjojMC4wLjAwMDAiLCJQIjojV2luMzIjLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=mjiAg15E1dpFJlsQoC%2FtPG336OZII4cEcu0T9Zpzhw%3D&reserved=0>

Please include ancillary expenses and itemise all costs including any money spent on alcohol.

Please provide any record of decisions to purchase alcohol if it was provided.

Please provide a copy of any further information about the event (separate to the Eventbrite listing) sent to ICO staff.

Please list any communications vacancies the event was promoting. The ICO's website refers to communications vacancies but there are none listed.

Please also provide the rental cost of the ICO's London office."

Where your questions satisfy the criteria of a valid information request, we have considered your request under the Freedom of Information Act 2000 (FOIA).

Our response

1. The total cost of the event was £19,843.43. An itemised expenditure is included in the attached disclosure (p.1).

2. No information is held recording the *decision to purchase alcohol*. However, in response to a enquiries made by one of our recognised trade unions, the ICO provided the following information:

By agreeing to host the event, we also committed to providing the same standard of refreshments that have been available at previous PLU events. PLU consider the wide range of backgrounds of their attendees and choose to provide soft drinks and some alcohol at their events.

The cost of the alcohol and glassware provided came to just under £500 for over 200 guests. Our provision was in line with the ICO's hospitality policy - Gifts and Hospitality Policy.

3. Please see the attached email (p.6) to staff and internal blog posts (pp.2-5) relating to the event.

Please note, we have redacted the personal data of staff on pages 3 and 6. The former being the reflections of an individual on speaking at a prior event. When they shared these reflections they would have understood this to be for internal staff consumption and not for disclosure to the wider world. Page 6 contains the name and contact details of an individual we do not believe would be fair to disclose to the wider world. This information has been redacted according to section 40(2) of the FOIA.

We have also redacted an internal ICO email. This email has been withheld according to section 31 of the FOIA. We shall explain our reliance on this exemption below this response.

4. We do not hold any information in relation to the promotion of such vacancies.

5. The London office rent comes to £85,256.09 per quarter.

Section 31

We have withheld an internal email address under section 31(1)(g) of the FOIA. We can do this when the disclosure of information "would, or would be likely to, prejudice...the exercise by any public authority of its functions for any of the purposes specified in subsection (2)."

In this case the relevant purposes contained in subsection 31(2) are 31(2)(a) and 31(2)(c):

*“ a. the purpose of ascertaining whether any person has failed to comply with the law, and
c. the purpose of ascertaining whether circumstances which would justify regulatory action in pursuance of any enactment exist or may arise.”*

Misuse of internal email addresses that exist to support ICO staff would likely prejudice our ability to perform our regulatory functions. Disclosure would leave us vulnerable to phishing or other cyber-attacks, spam, or an increased volume of irrelevant correspondence which it would take us time to process.

There are other channels that the public can use to contact us, and they are publicly available via [our website](#).

The exemption at section 31(1)(g) is not absolute. When considering whether to apply it in response to a request for information, there is a ‘public interest test’. We have to consider whether the public interest favours withholding or disclosing the information.

In this case the public interest factor in favour of disclosing the information is:

- Increased transparency in the way in which the ICO conducts its operations.

The public interest factors in maintaining the exemption are as follows:

- Internal email addresses being used inappropriately will reduce the effectiveness and efficiency of our regulatory functions.
- The information of primary relevance to your request is not affected by the redaction of our internal email addresses.
- The public interest in transparency is met by the public provision of other more appropriate means of contacting us.

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.

This concludes our response.

We hope you find this information helpful.