

██████████  
Operational Data Team  
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By email only to: [dataprotection@beis.gov.uk](mailto:dataprotection@beis.gov.uk)

2 August 2023

Dear ██████████

**Case Reference Number: IC/0209/2023**

Thank you for your correspondence of 25 July 2023 in which you provided a response to my further enquiries regarding the case referenced above.

I write to inform you that the Information Commissioner's Office (ICO) has now completed its consideration of this matter and based on the information provided, we have decided not to pursue this case further.

This case has been considered under the United Kingdom General Data Protection Regulation (UK GDPR) due to the nature of the processing involved.

**Our consideration of this case**

In summary, the ICO was made aware of a data protection matter involving the Counter Disinformation Unit (CDU) for which DSIT is the relevant Data Controller. Specifically, the ICO became aware of a news article published by the Telegraph on 6 June 2023 which referred to the CDU's activities involving the monitoring of individuals social media posts to flag potential disinformation.

DSIT has explained that the CDU's purpose is to understand disinformation narratives and attempts to artificially manipulate the information environment in the UK. This ensures that the government understands the extent, scope and reach of harmful mis and disinformation and can take appropriate action. Such action can include rebutting the claim, awareness raising campaigns to promote the facts, and working with social media companies to encourage them to promote authoritative sources of information and consistently enforce their terms of service.

The CDU uses publicly available information, including material shared on social media, to develop an understanding of disinformation narratives and trends that could pose a risk to public health, public safety or national security. These areas of focus are agreed with Ministers, as are the specific monitoring categories in each area.

The content which the CDU reviews may incidentally contain personal data, such as usernames and social media handles. However, personal data is anonymised wherever possible. As the CDU is focused on overall narratives and trends within the information environment and not individual pieces of content, the amount of personal data included within reporting is minimised and only where operationally necessary.

We have also noted the following:

- A Privacy Notice has been published for the CDU which sets out how the CDU processes personal data, including its lawful basis for processing.
- The CDU has appointed a third party to help conduct analysis of social media platforms and a relevant contract is in place with regular oversight.
- A Data Protection Impact Assessment has been conducted for the CDU.
- A Data Protection and Compliance Policy is in place for the CDU.
- The CDU only retains personal data for as long as is necessary which is typically no more than two years, in line with DSIT's retention policy.

Therefore, after careful consideration and based on the information provided, we have decided not to pursue this matter further.

Please be aware, if further information relating to this matter comes to light, or if any further matters which concern DSIT's data protection compliance are reported to us, we may revisit this matter.

Further information about compliance with the UK GDPR can be found at the following [link](#).

Thank you for your co-operation and assistance during this case.

We now consider the matter closed.

Yours sincerely,

Jessica Malpass  
Investigation Officer - Civil Investigations  
Regulatory Supervision Service

Information Commissioner's Office  
Direct dial – 03303 131 864

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*The ICO publishes basic details about the complaints, investigations and self-reported data breaches it handles. These details include the name of the organisation concerned, the dates that we opened and closed the case, and the outcome. Examples of published data sets can be found at this link (<https://ico.org.uk/about-the-ico/our-information/complaints-and-concerns-data-sets/>).*

*We do not include personal data in the published datasets and will anonymise the names of sole traders etc prior to publication. We also do not publish cases concerning domestic CCTV complaints and may not publish certain other cases if we feel it is not appropriate to do so in the circumstances.*

*If you wish to raise an objection to us publishing a case in the datasets, whether or not we have published it yet, please contact us explaining your reasons for this at [accessicoinformation@ico.org.uk](mailto:accessicoinformation@ico.org.uk)*

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*For information about what we do with personal data see our privacy notice at [www.ico.org.uk/privacy-notice](http://www.ico.org.uk/privacy-notice)*