

18 July 2024

IC-319358-X4S1

Request

On 13 July 2024 you requested information about the way we record our [data security incident trends](#).

You asked us to disclose *"the list of all the variable names in the database, together with any descriptive/user guides of the variable names in the database."*

You also stated that *"The database might be a relational database comprised of more than one database (table) that can be joined by a key variable. If so I would like this information for all the composite tables."*

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

Response

We hold information that falls within scope of your request. This information has been withheld in accordance with Section 31 of the FOIA. This is because it relates to certain aspects of the systems we use which, if disclosed, would be likely to compromise the security of these and leave us vulnerable to criminal activity by malicious actors.

Section 31(1)(a) of FOIA states that:

"Information... is exempt information if its disclosure under this Act would, or would be likely to, prejudice- (a) the prevention or detection of crime..."

As stated in our guidance, this covers *"all aspects of the prevention and detection of crime"* and can be used to *"withhold information that would make anyone, including the public authority itself, more vulnerable to crime for example, by disclosing its own security procedures..."*.

As a data controller, we have a duty to safeguard the information that we hold. The 'security principle' of the UK GDPR, states that a data controller must process personal data securely by means of appropriate technical and organisational measures. These measures must ensure the confidentiality, integrity and availability of systems and services and the information processed within them.

We consider that disclosure of this information would be likely to prejudice our effectiveness as a data controller and compromise our ability to protect the information we hold. We have therefore considered the public interest test for and against disclosure.

In this instance, the public interest factors in favour of disclosure are:

- Increased transparency in the way in which the ICO processes information.

The public interest factors in favour of maintaining the exemption are:

- There is a strong public interest in the ICO maintaining the security and integrity of the information it holds.
- The risk that, if disclosed, such information could be used by malicious actors seeking criminal access to our information and systems.

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.

Advice and assistance

The [breach form](#) on our website contains some information about the fields we use. We publish information about related casework [here](#) (including personal data breaches and investigations) and you can search our responses to previous requests on similar topics [here](#).

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](#) 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



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