

23 October 2024

**Ref IC-336630-T8M9**

**Request**

You asked us for

*"1. Policies and guidelines the ICO follows when handling personal data breaches involving survivors of domestic abuse and sexual abuse.*

*2. Any training programs or collaborations the ICO has in place with specialist organisations (such as Women's Aid or similar advocacy groups) to ensure staff are appropriately aware of the particular data sensitivities involving domestic or sexual abuse survivors.*

*3. Statistics or reports over the last 3 years on complaints related to data breaches involving low number/individual domestic and sexual abuse survivors, including any outcomes or actions taken by the ICO to address these cases.*

*For example, in 2022, where a breach's harm involved a domestic abuse victim who was scared for her own safety and her daughter's safety:*

*<https://www.mylondon.news/news/west-london-news/london-council-defends-human-error-28170305>*

*4. Any internal assessments carried out by the ICO regarding how personal data breaches involving vulnerable individuals, particularly domestic and sexual abuse survivors, are handled."*

We received your request on 8 October.

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

## **Our response**

We hold some information within the scope of your request.

1. We do not have any policies or guidelines for handling personal data breaches which specifically mention survivors of domestic abuse and sexual abuse. If a breach report suggests that such individuals were affected by a breach, this is something that staff would take into account along with other factors when assessing the seriousness of the breach.

Our internal guide for assessing data breaches, which is available on our disclosure log [here](#), touches on cases involving vulnerable data subjects and how this informs our decision making in such cases.

2. We have not implemented any such training programs with external partners.
3. We do not hold statistics on this and are not able to collate them as our case management system does not categorise cases in this way. However, our report on identifying the harms of personal data breaches, which focuses on the impact of data breaches on vulnerable people, including domestic abuse survivors, is available on our disclosure log [here](#) (see 'disclosure 2').
4. The report highlighted above includes in depth analysis of a selection of data breach reports received by the ICO where vulnerable people such as domestic abuse survivors were affected and how such cases are handled by the ICO, including some case studies which are relevant to your request.

Where we have provided links to information available on our website, this information is technically exempt under s.21 FOIA.

We would also flag the work of our [Communities Working Group](#), which is looking at how the ICO's work can best assist vulnerable people, including domestic abuse survivors. The ICO will be publishing more information about this in the near future.

## **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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