

11 November 2024

Ref: IC-338388-R1J1

Request

You asked us for:

“other information held in relation to the harms project which would assist my research – see below. I am also interested in work around definition and identification of vulnerable data subjects.”

We received your request on 17 October.

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

Our response

We do hold some information within the scope of your request.

We have focused our searches here on information connected to the 2022 data protection harms project in relation to vulnerable people and information held more generally about how vulnerability is identified and defined.

With regards to the data protection harms project completed in 2022 which included the literature review, we have limited information still held about this project and it did not have a focus on vulnerable individuals, so the work did not include any analysis on what constitutes vulnerability.

We have however done more work focused on the impact of data breaches etc on vulnerable people since that project was completed.

Notably, this year we completed a report which focused on reviewing a selection of data breach reports received by the ICO which effected people considered to

be vulnerable, and considered how the ICO handled those cases and what can be done to improve support for such individuals. This report was disclosed in response to a previous request and is available on our disclosure log [here](#) (see 'disclosure 2'). This includes an analysis on what constitutes vulnerability in a data protection context.

The other document disclosed in response to that request is a summary of the work of the Communities Working Group, which focuses on how the ICO's work can best assist vulnerable people. This document also includes the group's working definition of vulnerability.

The group has recently published a new set of guidance for data controllers to help them to treat people effected by a data breach with empathy, particularly where they are vulnerable. This, alongside the materials from our connected 'ripple effect' campaign are available on our website [here](#).

You may also be interested in a seminar which was presented at our recent Data Protection Practitioner's Conference on assessing the harms of a data breach, the presentation and slides are available on our website [here](#).

Information that is available on our website is technically exempt under s.21 FOIA.

We hope that this information is useful to you. If you would like to request further information, it would assist us if you can provide specifics about the type of information that you are looking for. The topic of your research is broad and relevant across multiple areas of the ICO's work so it would be helpful if you can give more detail on the subject matter that you are interested in so that we can identify relevant pieces of information. Also, it would be helpful to know the type of information sources that you are looking for, for example reports, internal or external training, advice given to organisations, internal guidance etc.

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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