

13 March 2025

Reference number: IC-366950-C9D5

Request

You asked us: *"...Clarification of ICO's policies on handling its own breaches..."*

We have understood this to be a request for our policies and procedures for handling data breaches that we have suffered.

We received your request on 25 February 2025.

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

Our response

Having searched our records, we can confirm that we hold information in the scope of your request.

Please find the relevant information attached which are titled: PDB Assessment Methodology, Security Incident Management Policy, Security Incident Reporting Guidance and Security Incident Report Form.

On the Security Incident Report Form, it should be noted that the form automatically populates the first name of the person completing the form.

We have withheld an internal phone number 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."

Disclosure of our internal IT Help phone number would lead to them receiving calls from the public. This would mean that our IT staff would be unable, or inhibited, from completing their daily tasks and this, in turn, prejudices our ability to complete our regulatory functions.

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 phone numbers 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 this phone number.
- 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.

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



Information Access Team
Strategic Planning and Transformation
Information Commissioner's Office, Wycliffe House, Water
Lane, Wilmslow, Cheshire SK9 5AF
ico.org.uk twitter.com/iconews
Please consider the environment before printing this email
**For information about what we do with personal data
see our [privacy notice](#)**