

17 February 2025

IC-360450-F0C4

## **Request**

On 4 February 2025 you asked us for:

Please provide an annual breakdown of the number of data breaches from businesses in the UK, as per the below:

- Type i.e. an external attack or internal negligence
- Industry
- Business size (Small: 1-49 employees, Medium: 50-249, Large: 250+)
- Geographic location (city)
- Geographic location (county)
- Fine amount
- Action i.e. further penalties, training required, closure

Please provide the data from 2020 up to the most recent date possible, divided into separate tabs in a spreadsheet per year.

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, but to locate the information required to respond to each of your points in entirety would exceed the cost limit outlined by Section 12 of the FOIA, as it would require extensive manual searches to locate every instance that matches this description within our casework management systems.

Section 12(2) states that a public authority is not obliged to confirm or deny the extent to which the requested information is held if the estimated cost of establishing this would exceed the appropriate cost limit. The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 stipulates that the 'appropriate limit' for the ICO is £450. We have determined that £450 would equate to 18 hours work.

We can electronically filter cases by incident type, sector, sub sector, county and city. These are all categories we use within our casework management systems. While these would cover some of your points, we cannot filter by organisation size, nor is our casework management system fully keyword searchable in this respect. While some organisations may have provided this information when reporting breaches to us, in order to locate all relevant instances, we would need to manually check the case record for every self reported data breach.

Furthermore, we cannot filter outcome details to the level you have requested either. We can filter for basic details, such as whether or not formal action or further investigations were undertaken, but electronic searches do not enable us to extract more specific details about these outcomes (such specific action taken, recommendations made or advice given). Locating this level of detail for every

case would require us to manually check individual case records. It is also worth noting that we already publish some information about casework, outcomes and actions taken, and links to this have been provided in the next section below.

Finally, information about personal data breaches is not held indefinitely, and in line with [our retention policy](#) we do not hold complete records for cases older than two years. In spite of this, what we do retain still covers thousands of self reported personal data breach cases. To search through all of these manually, even if it only took two minutes per case (and for complex cases it could take longer, depending on the amount of material we hold) would certainly exceed the 18 hours which would accrue a charge of £450 or less, triggering the provisions of section 12 of the FOIA. On this basis, we are refusing your request.

## **Advice and assistance**

We publish some information about self reported data breach cases and other types of casework [here](#), and these can be filtered by a range of criteria including data controller name, sector and outcome, as mentioned above. We also publish some details about [data security incident trends](#), [fines and other action taken](#), and other information within our [annual reports](#).

It is likely that the information we publish will cover much of what you have requested, however we can consider a request to include any categories that are not included within our published data sets, where these match the categories used within our casework management system (see examples provided above).

Alternatively it may be possible to consider some or all of the criteria you have asked about, within the cost limit, by restricting the number of cases we would

need to search. You could do this by specifying a shorter date range, or by using a combination of criteria (such as specific outcomes or data controllers).

However, please note that requests for information that identify third parties and/or relate to live investigations, may be subject to exemptions. Please also note that any of the information we publish already or are due to publish, may also be covered by exemptions if requested (for example details about more recent cases which are due to be published in the future).

Please note that any request requiring us to manually search large numbers of records for specific keywords which do not relate to categories we use in our systems, is likely to exceed the appropriate limit, and we cannot guarantee the accuracy of the results provided following a manual search. Consideration can also be given as to whether the value to the public of the information derived from such searches is proportionate to the effort to locate it, particularly given the issues regarding accuracy described.

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



Information Access Team  
Strategic Planning and Transformation  
Information Commissioner's Office, Wycliffe House, Water  
Lane, Wilmslow, Cheshire SK9 5AF  
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