

**Privacy Notices Code of Practice; A practical guide to IT Security; Wi- Fi Location Analytics guidance; Using crime and taxation exemptions (section 29); Preparing for the General Data Protection Regulations (GDPR) – 12 Steps to take now; Overview of the GDPR; How to disclose information safely – removing personal data from information requests and datasets; Assessing Adequacy – International Data Transfers**

**Information Commissioner’s Office (ICO)**

**RPC rating: validated**

This Opinion covers eight small measures; for each, a brief description of the change is given in the table below. All eight have an Equivalent Annual Net Direct Cost to Business (EANDCB) which rounds to zero.

<b>Measure</b>	<b>Description</b>
RPC17-MOJ-ICO-3929 Privacy Notices Code of Practice	This Code of Practice provides advice, guidance and good practice recommendations to organisations, including businesses, to help them to meet their obligations to tell people how they are using their personal data and to seek consent where appropriate. These obligations arise from the current DPA and are further developed in the new EU General Data Protection Regulation (GDPR). The ICO cannot take action for failure of businesses to adopt good practice but it can pursue enforcement action where an organisation breaches the requirements of the DPA.
RPC17-MOJ-ICO-3930 – A practical guide to IT Security	This guidance document provides practical advice on IT security measures that organisations can take to safeguard personal data. It is aimed principally at SMEs. The document provides good practical advice on how to meet the requirements in the DPA and it does not impose any further obligations.

<p>RPC17-MOJ-ICO-3931 – Wi- Fi Location Analytics guidance</p>	<p>This guidance document provides good practice advice to operators of Wi-Fi and other communication networks. It explains how they may use location and other analytics information in a manner compliant with the DPA and it does not impose any further obligations.</p>
<p>RPC17-MOJ-ICO-3932 – Using crime and taxation exemptions (section 29)</p>	<p>This guidance document provides good practice advice to business that process personal data. It explains how to apply the exemption to personal data when it is processed for the purposes of crime and/or taxation. It does not impose any further obligations beyond what is required in the DPA.</p>
<p>RPC17-MOJ-ICO-3933 – Preparing for the General Data Protection Regulations (GDPR) – 12 Steps to take now</p>	<p>This guidance document provides good practice advice to prepare organisations for the enforcement of the GDPR in May 2018. It is not enforceable and does not impose any further obligations beyond what is required in the DPA.</p>
<p>RPC17-MOJ-ICO-3934 – Overview of the GDPR</p>	<p>This guidance document provides good practice advice on the provisions of the GDPR. The GDPR sets out a new legal framework for the processing of personal data in the EU and the document provides advice on how to comply with that framework. It is not enforceable and does not impose any further obligations beyond what is required in the DPA/GDPR.</p>
<p>RPC17-MOJ-ICO-3935 – How to disclose information safely – removing personal data from information</p>	<p>This guidance document provides good practice advice on how to respond appropriately to requests for information without disclosing personal or other data in error. It is not enforceable and does not impose any further obligations beyond what is required in the DPA, Freedom of Information Act or the Environmental Information Regulations.</p>

requests and datasets	
RPC17-MOJ-ICO-3936 – Assessing Adequacy – International Data Transfers	This guidance document provides good practice advice on how organisations should analyse the protection of data that it is transferring out of the European Economic Area. It is not enforceable and does not impose any further obligations beyond what is required in the DPA

## Impacts of proposal

The guidance the ICO prepared are potentially relevant to all businesses that process personal data, i.e. most if not all businesses in the country. The guidance are aimed at explaining the DPA and GDPR so that it is easier for organisations to comply with them. None of the guidance are required reading and the ICO cannot take action against organisations that do not read them. The costs are thus based on people reading the ICO’s website to familiarise themselves with the guidance. They use the web hits as a proxy for the number of organisations reading its guidance documents. They provide figures for the split between private and public organisations. There is no way to estimate the counterfactual i.e. the cost of businesses not reading the guidance.

## Quality of submission

The assessments are clear and concise, and provide appropriate evidence in support of a zero EANDCB in each case. The ICO uses information based on hits on its website to act as a proxy for count of readership of the code. The assessments would be improved by setting out clearly the implications of each set of guidance, and by explaining more clearly that business benefits should exceed costs for any changes made to business practices as a result of reading the guidance. In some cases, the ICO has taken a shorter appraisal period to reflect the fact that guidance is likely to change following the UK’s exit from the EU; this seems appropriate.

## Departmental assessment

Classification	All Qualifying regulatory provisions
Equivalent annual net cost to business	All £0.0 million

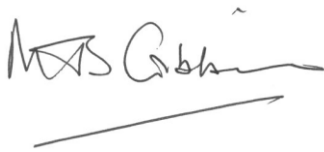
Opinion: EANDCB validation  
Origin: domestic/European  
RPC reference number: See table  
Date of implementation: See table

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(EANDCB)	
Business net present value	All £0.0 million

**RPC assessment**

Classification	All Qualifying Regulatory Provisions
EANDCB – RPC validated <sup>1</sup>	All £0.0 million
Business Impact Target (BIT) Score <sup>1</sup>	All £0.0 million



**Michael Gibbons CBE**, Chairman

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<sup>1</sup> For reporting purposes, the RPC validates EANDCB and BIT score figures to the nearest £100,000.