The Information Commissioner’s Office has issued guidance on its experience with inadvertent disclosures of personal data in datasets.

The problem of inadvertent disclosures, specifically where pivot tables are involved, came to the ICO’s attention from freedom of information disclosures made via the WhatDoTheyKnow website.

The issue relates to responses to FOI requests provided in spreadsheets. According to the ICO, public authorities will often respond to requests by supplying the information requested in spreadsheet format. Sometimes that will be in the form of a ‘pivot table’, which can neatly summarise the information, without revealing the underlying personal information the summary is based on.

However, public authorities are not always properly removing the underlying data before disclosing. Pivot tables, both in Microsoft Excel and other spreadsheet programmes, retain a copy of the source data used. “This information is hidden from view, but is easily accessible”, says the ICO.

WhatDoTheyKnow published their own suggestions for overcoming the issue.

The ICO’s suggestions (which are similar to the WhatDoTheyKnow advice) are that public authorities should: avoid using pivot tables for any disclosures or data sharing involving personal data, and consider using CSV files; check the file sizes before disclosure – larger than expected file sizes should be a trigger for further checks; ensure that their organisation has the right procedures and checklists in place for staff...