WHAT TO DO IF THE ICO CONTACTS YOU

Director Playbook – UK GDPR

London Hair At Home Ltd

Purpose

This playbook provides clear guidance for responding professionally and lawfully if contacted by the Information Commissioner's Office (ICO).

Step 1 – Stay Calm

ICO contact does not automatically indicate wrongdoing. Most contact is advisory or investigative.

Step 2 – Identify the Contact Type

Check reference number, deadline, and whether the enquiry relates to a complaint, breach, or general request.

Step 3 – Acknowledge Promptly

Acknowledge receipt promptly, even if you need more time to respond fully.

Step 4 – Gather Records

Retrieve your Data Protection File, including policies, consent records, SAR logs, and ICO registration.

Step 5 – Review Internally

Identify the data involved, lawful basis, consent records, and any corrective actions already taken.

Step 6 – Do Not Alter Data

Do not delete, amend, or retrospectively alter records once ICO contact has been made.

Step 7 – Respond Clearly

Provide clear, honest, evidence-based responses in plain English.

Step 8 – If a Breach Is Involved

Explain what happened, when, who was affected, mitigation steps, and whether individuals were informed.

Step 9 – Complaints

If the matter arises from a complaint, explain your complaints process and how it was handled.

Step 10 – When to Seek Legal Advice

Seek legal advice if enforcement action, fines, or complex issues are raised.

Step 11 – Record the Outcome

Log ICO contact details, actions taken, and outcomes in your Data Protection File.

Step 12 – Improve Practices

Update policies, procedures, and training following resolution.

Director Reminder

Demonstrating cooperation, transparency, and improvement is central to ICO expectations. This document should be retained as part of your Data Protection File.