ICO consultation:

Draft journalism code of practice impact assessment

Start date: 13 October 2021

End date: 24 January 2022



Introduction

We are seeking feedback on the draft impact assessment for the draft code of practice about processing personal data for the purposes of journalism. This is a statutory code under section 124 of the Data Protection Act 2018 (DPA 2018).

The impact assessment sets out the context, methodology and findings of the assessment and should be read alongside the draft code.

The draft code and impact assessment are now out for public consultation. The public consultation will remain open until 24 January 2022.

**Download this document** and email to: journalismcode@ico.org.uk

**Print off this document** and post to:

Journalism Code of Practice

Regulatory Assurance

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

If you have any general queries about the consultation, please email us at journalismcode@ico.org.uk

**Privacy statement**

For this consultation, we will publish all responses except for those where the respondent indicates that they are an individual acting in a private capacity (eg a member of the public). All responses from organisations and individuals responding in a professional capacity will be published. We will remove email addresses and telephone numbers from these responses but apart from this, we will publish them in full.

For more information about what we do with personal data please see our [privacy notice.](https://ico.org.uk/global/privacy-notice/responding-to-our-consultation-requests-and-surveys/)

Questions

When commenting, please bear in mind that we aim to focus on the findings of the impact assessment rather than the code itself. Matters relating to the code should be set out in responses to the consultation on **the code itself.** Although efforts have been made to make the impact assessment as accessible as possible, there may be areas where we have assumed some knowledge of general impact assessment terms and concepts. Where relevant, the code may link to further reading such as the [Department For Business Energy and Industrial Strategy's note on the appraisal of guidance](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609201/business-impact-target-guidance-appraisal.pdf), which may be useful in understanding the impact assessment and its findings.

**Q1** To what extent do you agree with the overall findings of the impact assessment?

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree nor disagree

[ ]  Disagree

[ ]  Strongly disagree

**Q1a** If you are able to elaborate on your answer to Q1, please do so below.

**Q2** Do you think that the set of impacts we have considered in the assessment is appropriate and that they have been given due consideration?

[ ]  Yes

[ ]  No

**Q2a** If no, please elaborate.

**Q3** Do you think that the set of affected groups we have considered in the assessment is appropriate and that they have been given due consideration?

[ ]  Yes

[ ]  No

**Q3a** If no, please elaborate.

**Q4** Do you think that the set of data protection related harms we have considered in the assessment is appropriate and that they have been given due consideration?

[ ]  Yes

[ ]  No

**Q4a** If no, please elaborate.

**Q5** Are you able to provide further evidence for us to consider in our impact assessment?

[ ]  Yes

[ ]  No

**Q5a** If yes, please could you provide the impact evidence or a link to it in the box below, or contact details where we can reach you to discuss further.

**Q6** Is there anything else you want to tell us about the impact assessment?

**Section 2 About you**

Please see privacy information above.

**Q7** What is your name?

**Q8** If applicable, what is the name of your organisation and your role?

**Q9 Are you acting:** Please select the capacity in which you are acting.

[ ]  Private capacity (eg someone providing their views as a member of the public)?

[ ]  Professional capacity?

[ ]  On behalf of an organisation?

[ ]  Other

If other, please specify.

**Q10** Are you: Please select most appropriate.

[ ]  A member of the public

[ ]  A citizen journalist

[ ]  A public figure (eg individuals who have a degree of media exposure due to their functions or commitments) or individual with a public role (eg politician, public official, business people and members of regulated professions)

[ ]  A representative of a newspaper or magazine

[ ]  A representative of a broadcaster

[ ]  A representative of an online service other than those above

[ ]  A representative of the views and interests of data subjects

[ ]  A representative of a trade association

[ ]  A representative of a regulator

[ ]  A representative of a ‘third sector’/’civil society’ body (eg charity, voluntary and community organisation, social enterprise or think tank)

[ ]  A freelance journalist

[ ]  A private investigator

[ ]  A photographer

[ ]  An academic

[ ]  A lawyer

[ ]  Other

If other, please specify.

**Q11** How familiar are you with impact assessments?

[ ]  Very familiar

[ ]  Somewhat familiar

[ ]  Somewhat unfamiliar

[ ]  Very unfamiliar

**Further consultation**

**Q12** Would you be happy for us to contact you regarding our consultation on the journalism code?

[ ]  Yes

[ ]  No

If so, please provide the best contact details.

**Q13** Would you be happy for us to contact you regarding our consultation on the statutory review of processing for the purposes of journalism under section 178 of the DPA 2018?

[ ]  Yes

[ ]  No

If so, please provide the best contact details.

**Thank you for taking the time to share your views and experience.**