

18 April 2023

ICO Case Reference IC-225900-F7W7

Request

On 23 March 2023 you made the following request:

Please can you supply the training you give to staff in respect of safeguarding.

Please can you advise on what training you give staff on the lawful basis for processing needing to be in the companies privacy notice, given that your case officers accept data sharing basis that are not included in Privacy Notices and allow breaches of the first principle of transparency and fairness.

We have dealt with your request in accordance with the Freedom of Information Act (2000).

Response

We do not hold any information in relation to the first part of your request. The training our staff receive is focused on the legislation that we regulate and the work that we do in relation to this. Please see the link below for more information about this:

<https://ico.org.uk/about-the-ico/what-we-do/>

We do not provide any specific safeguarding training and if relevant matters are raised within the context of our work these will be handled on a case by case basis, in accordance with the relevant legislation.

In relation to the second part of your request, training in relation to lawful basis for processing, data sharing and privacy notices is provided in our data protection training. The following modules are relevant to the topics raised in your request:

- Module 1 gives an introduction to lawful basis and fair processing.
- Module 3 looks at principle (a) and lawful processing in more detail.

- Module 7 mentions data sharing.
- Module 9 mentions the right to be informed.
- Module 10 mentions exemptions to the right to be informed.

Privacy notice requirements are also referenced in the above modules. More details about the module contents can be found on our website here:

<https://ico.org.uk/training>

This training is required for staff working in Information Rights roles (including staff who deal with public advice, data protection complaints and information requests) and staff working in other roles may choose to complete these modules subject to the approval of their line manager.

This concludes our response to your request.

Next Steps

Please come back to us in the first instance if you would like a clarification or a review of the way your request has been handled. If you remain dissatisfied you can then request a review of our decision under the FOIA or make a complaint about how your request has been handled by writing to the Information Access Team at the address below or email icoaccessinformation@ico.org.uk.

Your request for internal review should be submitted to us within 40 working days of receipt by you of this response. Any such request received after this time will only be considered at the discretion of the Commissioner.

If having exhausted the review process you are not content that your request or review has been dealt with correctly, you have a further right of appeal to this office in our capacity as the statutory complaint handler under the legislation. To make such an application, please write to our FOI Complaints & Appeals Department at the address below or visit our website if you wish to make a complaint under the Freedom of Information Act.

A copy of our review procedure can be accessed from our website [here](#).

Your rights

Our [privacy notice](#) explains what we do with the personal data you provide to us and what your rights are, with a specific entry, for example, for [an information requester](#). Our retention policy can be found [here](#).

Yours sincerely,



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data see our [privacy notice](#)**