

17 July 2023

IC-240016-T2D7

Request

You asked us:

A) All and any information the ICO may hold to assist in eradicating bias conduct within the service and the targeting of requesters of information at other organisations and the ICO itself, whom maybe targeted for being disabled or falsely accused, complainants, or any other reason - harassed or victimised by the NHS or any other in order to further censorship.

We received your request on 16 June 2023.

We have handled your request under the Freedom of Information Act 2000 (the FOIA).

Our response

I have searched our electronic systems and have not found any specific reference to the phrases "eradicating bias conduct" or "eradicate bias conduct". We have therefore considered your request to be for information relating to how we avoid bias in our work and, where relevant, support those we regulate to do the same.

Taken in this context we do hold some information which falls within the scope of your request.

As part of their induction to the ICO all staff are required to complete a training module on Dignity, diversity and inclusion, which focuses on inclusion and our Dignity at work policy. We also have the following training available which we believe is relevant to your request:

- Promoting inclusion for people managers
- Promoting inclusion (for all staff)
- Disability awareness
- Equality impact assessment training

The [ICO Code of Conduct](#) explicitly states that ICO staff should deal with affairs of the public without bias, at 6.1 of the document.

We have conducted Equality Impact Assessments, which help to assess the equality relevance of a policy or procedure on one or more groups of people with protected characteristics. These are available on our [website](#).

The ICO commissioned an Equality, Diversity and Inclusion audit report which was produced for the ICO in 2022 and is available on our [disclosure log](#).

We have a number of policies in place to support those wanting to access our services, which include the following:

- [Reasonable adjustment policy for accessing ICO services](#)
- [Service standards](#) available on our website including information about support for those with access needs
- [Translations policy](#)

In relation to our FOI complaints work, the [service guide](#) sets out how work should be undertaken and makes reference to equality.

Our document [Delivering a Better FOI Service](#) sets out how our new prioritisation framework for FOIA complaints will remain 'requester blind'.

We look at complaints brought to us on a case by case basis, with reference to their compliance with the legislation we oversee. In relation to allegations of bias conduct in the organisations we regulate, the Equality and Human Rights Commission (EHRC) are responsible for regulating equality and human rights legislation. The ICO does include some information on our website for those we regulate which may be considered to fall within the scope of your request. This includes the following:

[Guidance relating to FOI requests being applicant and motive blind](#)
[Guidance regarding making reasonable adjustments for requests made under data protection legislation](#)

The ICO is committed to developing a workforce that is representative of the communities we serve and building an inclusive workplace where all colleagues have the opportunity to make a difference. There is a large amount of information on our website relating to our [equality, diversity and inclusion \(EDI\)](#) aims which may be of interest to you.

Although I appreciate that the information provided above may not be exactly what you were seeking, I hope that it helps to demonstrate how seriously the ICO takes its commitment to ensure equality of access to our services and through that the avoidance of bias conduct.

As the information provided in this response is already publicly available it is technically exempt under section 21 of the FOIA.

This concludes our response to your request. Thank you for your interest in the work of the ICO.

Next steps

You can ask us to review our response. Please let us know in writing if you want us to carry out a review. Please do so within 40 working days.

You can read a copy of our full review procedure [here](#).

If we perform a review but you are still dissatisfied, you can complain to the ICO as regulator of the FOIA. This complaint will be handled just like a complaint made to the ICO about any other public authority.

You can [raise a complaint through our website](#).

Your information

Our [Privacy notice](#) explains what we do with the personal data you provide to us, and set out your rights. Our retention schedule can be found [here](#).

Yours sincerely



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