

16 September 2024

IC-329094-M7G9

Request

On 31 August 2024 you made the following request:

Please provide a copy of all policy documents, staff guidance, training materials and any other documents used by the Information Commissioner's Office ("ICO") applicable to the management and handling of actual or perceived conflicts of interest by the ICO or its staff in the course of its/their work or discharging its/their statutory duties.

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

Response

We hold information that falls under the scope of your request. However, we are refusing the request because to locate the information requested in entirety would exceed the cost limit set out by section 12 of the Freedom of Information Act 2000 (FOIA).

Documents that are '*applicable to the management and handling of actual or perceived conflicts of interest by the ICO or its staff in the course of its/their work or discharging its/their statutory duties*' may include policies, guidance and training materials used internally by different teams, as well as documents generated in relation to specific cases or projects. This topic is widely cited and may appear in various types of document.

Some of the information we hold about conflicts of interest is already publicly available – we have provided links to this and suggestions on refining your request under the advice and assistance section below.

An initial search of our document management system for the term 'conflict of interest' generates over 5000 results. Assuming it took only one minute to check each result (and in many cases, such as where the result is a long and/or complex document, this could take longer), this would involve over 80 hours of work.

Locating all the information in scope of this request would certainly exceed the 18 hours which would accrue a charge of £450 or less, triggering the provisions of section 12 of the FOIA. On this basis, we are refusing your request.

Advice and assistance

We do not have a single 'conflict of interest policy', but some information concerning conflicts of interests at the ICO has already been published online, for example:

- The [ICO Code of Conduct](#), which includes a section on conflicts of interest and political activities;
- The [Declaration of Interests policy and procedures](#) for board members; and
- The [ICO Policy and Procedure Regarding Political Activities](#).

We could consider requests for conflict of interest materials held by a specific team or in relation to a specific part of our regulatory work, such as dealing with complaints or conducting audits. We could also consider requests around this topic which include more specific criteria, such as a certain type of document.

If you do decide to refine your request, please note that any request requiring us to manually search large numbers of records is likely to exceed the appropriate limit, and the accuracy of any such searches could not be guaranteed. Consideration can also be given as to whether the value to the public of any resulting information is proportionate to the effort to locate it, particularly given the issues regarding accuracy described.

This concludes our response to your request.

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](#) on our website.

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 sets out [your rights](#). Our [Retention and Disposal Policy](#) details how long we keep information.

Yours sincerely



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