

19 November 2024

**Ref: IC-339964-N6X7**

## Request

You asked us:

"Information Requested:

1. Training on 'Doxxing' and 'Outing':

- Has the ICO provided specific training on the risks of 'Doxxing' and 'Outing', particularly in relation to LGBTQ+ individuals?
- Has the ICO consulted with LGBTQ+ organizations such as Galop or Terrence Higgins Trust to ensure best practices?

2. Training on 'Deadnaming':

- Does the ICO train staff on 'Deadnaming', especially when handling breaches involving transgender and non-binary individuals? Has such guidance been developed in collaboration with relevant LGBTQ+ advocacy groups?

3. Training on LGBTQ+ Domestic Violence and Sexual Abuse Survivors:

- Are ICO staff trained to address the privacy needs of LGBTQ+ survivors of sexual abuse and domestic violence, whose confidentiality is critical to their safety?
- Has the ICO worked with organizations like Galop to ensure staff are aware of the heightened risks for these individuals?

4. Collaboration with LGBTQ+ Support Groups:

- Has the ICO collaborated with LGBTQ+ organizations to develop its training programs for handling sensitive data breaches involving sexual orientation and gender identity?

5. Confidence and Trust of LGBTQ+ Individuals:

- What steps has the ICO taken to ensure LGBTQ+ individuals feel confident that their data breach concerns will be handled sensitively and without retraumatisation?

6. Content of Training Programs:

- Please provide any materials or outlines used to train ICO staff in handling breaches related to sexual orientation, gender identity, or LGBTQ+ concerns

We received your request on 23 October.

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

**Our response**

We hold some information within the scope of your request.

Our [Trans Policy](#) includes our gender recognition case procedure and is within the scope of part two of your request.

Our [Equality, Diversity and Inclusion Policy](#) sets the standards that staff are expected to meet in order to ensure compliance with Equality Act and is generally within the scope of your request.

Aside from this, we do not have any training, policies or guidance which specifically reference LGBTQ+ individuals or the concerns which you mention in your request.

The seriousness of data breaches reported to us is assessed with reference to our Assessing Personal Data Breaches guide (available on our website [here](#)) which provides that the type of data effected, and the personal circumstances of data subjects should be taken into account in this assessing impact. This would allow for consideration of the factors mentioned in your request.

Staff are expected to support each person accessing the ICO's services to do so in the way that is best suited to their individual needs. We would direct you to our [Reasonable Adjustments Policy](#), [Code of Conduct](#), [Service Standards](#) and [ICO Service Charter](#), which set out the general principles that staff should follow in order to ensure this.

The information that we hold that is within the scope of your request is available on our website and so is technically exempt under s.21 FOIA.

You may be interested in a set of guidance the ICO had produced for Data Controllers to help them to understand the impact of a data breach on vulnerable data subjects and to support them when they are affected by one, which are available on our website [here](#).

You may also find useful the disclosures to a previous information request which are available on our website [here](#), these relate to the work that the ICO has done around supporting vulnerable people more generally to uphold their information rights.

### **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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