

24 December 2024

IC-345257-K2M6

Request

On 19 November 2024 you requested the following:

- “1. Any policies or procedures for job grading or regrading.
2. Any completed applications submitted for job regrades or newly created roles including Head of Department sign off and panel discussion (redacted if necessary to remove personal data)
3. Please provide a breakdown of the number of successful regrades.
4. Please provide a list of newly created jobs and a list of jobs that were regraded via the grading process.”

On 3 December 2024 you clarified that in relation to points 2-4 you would like us to focus on new roles graded at level E and F, and existing roles regraded to E and F between 3 December 2022 and 3 December 2024.

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

Response

In relation to point 1 a copy of the policy is attached (see disclosure 1). Please note that this is currently being updated as there have been changes to the relevant processes since this document was created.

In relation to point 2, we have conducted reasonable searches for application forms, Head of Department sign offs and panel discussions relating to the job evaluation process for roles that were created at (or regraded to) levels E and F, between 3 December 2022 and 3 December 2024. These searches focused on records held centrally by the team that is responsible for the job evaluation process.

A copy of the information that falls within scope is attached (see disclosure 2). Please note that some personal data has been redacted in accordance with Section 40(2) of the FOIA. The Target Operating Model (TOM) mentioned in the Finance Business Partner application (see page 73) has been withheld in accordance with Section 36 of the FOIA. More details about the relevant exemptions are provided on the next page of this letter.

Please note that as the relevant processes have changed over time, we do not hold the same types of documentation for every role proposed. Not all roles involved an application form and sign off as specified in your request. For some a job description formed the basis of the application and where we hold this or an application form, these have been provided.

Furthermore, we do not hold panel discussions in relation to role evaluations, so we do not hold any information that falls within scope of that part of your request. Panel members, including the trade unions, typically submit comments via email rather than holding a meeting or discussion. However, as mentioned above, the ways in which this part of the process have been conducted and documented varies over the time period covered by your request (and between roles).

In relation to point 3, we do not hold this information. There is no business need for us to distinguish between new and regraded roles in relation to the evaluation process, or to keep a centralised record of this distinction. The evaluation/grading process determines what grade a role is assigned, not whether or not the position is recruited to, which is a separate process. Evaluation outcomes are communicated to the teams and individuals involved, and some roles do not progress any further (ie to recruitment), so detailed records are not necessarily maintained centrally in all cases.

In relation to point 4, please find below a list of roles that were subject to job evaluation over the period specified, and were created at (or regraded to) levels E and F. As above, not all of these were ultimately recruited to.

Insights Manager
Senior Insights Officer
Senior Research Officer - Quantitative
Senior Research Officer - Qualitative
Senior Data Analyst
Litigation Lawyer
Senior Policy Officer - PADPCS
IT Service Manager

Senior Talent Advisor
Senior / Principle Digital Delivery Manager
User Experience & Research Lead
Scrum Master
Senior / Principal Product Owner
Web Engineer
Senior / Principal Data Architect
Solution Architect - Data Platform
Senior IT Service Manager
Test Manager
Data Engineer
Data Analyst
Senior Data Analyst - DDAT
Estates and Facilities Manager
Applications Operations Manager
Cyber Specialist NIS Focus
Cyber Development Lead
User Centred Design Lead Research
People Services Business Manager
PMO Manager
Finance Business Partner
Senior Communications Officer (Digital)
Workday Product Owner
Workday Support Officer (Finance and Procurement)
Workday Support Officer (People Services)

Information withheld - FOIA Section 40(2)

Where information in the attached disclosure relates to existing post holders it has been withheld under section 40(2) of the FOIA, and the relevant details have been redacted from the attached disclosure.

Disclosure of this data would break the first principle of data protection - that personal data is processed lawfully, fairly and in a transparent manner.

There is no strong legitimate interest that would override the prejudice that disclosure would cause to the rights and freedoms of the individuals concerned. So we are withholding the information under section 40(2) of the FOIA.

Information withheld - FOIA Section 36

The Target Operating Model (TOM) attachment mentioned on page 73 of disclosure 2 has been withheld in accordance with Section 36 of the FOIA.

Section 36 provides that – “Information to which this section applies is exempt information if in the reasonable opinion of a qualified person disclosure of the information under this Act— (b) would, or would be likely to, inhibit— (i) the free and frank provision of advice, or (ii) the free and frank exchange of views for the purposes of deliberation” And: (c) would otherwise prejudice, or would be likely otherwise to prejudice, the effective conduct of public affairs.”

Section 36 is not an absolute exemption, and we must consider the prejudice or harm which may be caused by disclosure. We also have to carry out a public interest test to weigh up the factors in favour of disclosure and those against. We have sought the opinion of our qualified person, the Information Commissioner, who considered the specific and detailed arguments which we are unable to replicate in full in our response.

However, in summary, we consider that disclosure would inhibit the free and frank exchange of views in future discussions, not only about the evaluation of new roles and the regrading of existing ones (and the context surrounding this), but also in relation to the specific matters discussed within the document, which we cannot describe in detail here as to do so would constitute disclosure.

This would be harmful to employee relations and the functioning of the ICO more broadly, given that efficient management of staff and resources is essential in ensuring that the ICO is able to undertake its regulatory duties.

There is a strong public interest in transparency in relation to the context surrounding the creation of new roles and the regrading of existing ones. Disclosure of information about this would lead to wider scrutiny of the departments involved and the ICO more broadly, which is in the public interest.

However, there is also a strong public interest in ICO staff being able to discuss issues surrounding the evaluation of new and existing roles openly, particularly where this relates to sensitive matters, and disclosure would reduce the level of candour in future consultations. If free and frank exchange of views is inhibited, ongoing work in this area may be disrupted, including flexibility to consider different options and find suitable solutions, as well as the timeliness and effectiveness of any relevant decision making.

There is also a public interest in the ICO managing employee relations and resources effectively, to ensure that regulatory duties can be performed efficiently.

It is worth noting that the ICO has a demonstrable history of sharing information about our work, when it is appropriate to do so, and that disclosure of the application and job description for the related role goes some way to satisfying the public interest in this area.

Having considered the factors for and against disclosure, we consider that the public interest falls in favour of withholding this information.

Advice and assistance

We can consider requests for other documentation associated with the creation of new or regraded roles, including that associated with other processes such as requests for resource, business cases or other types documentation relating to evaluation. Please note that information held in relation to some roles may be limited, particularly any correspondence, for which retention is typically one year. It would be helpful if making any follow up requests on this topic to specify criteria that will help us to target our searches effectively, such as a specific date range, process, type of role or documentation type.

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.

Please also note that exemptions may apply to information about this topic, particularly where this relates to identifiable post holders or applicants.

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



Information Access Team
Strategic Planning and Transformation
Information Commissioner's Office, Wycliffe House, Water
Lane, Wilmslow, Cheshire SK9 5AF
ico.org.uk twitter.com/iconews
Please consider the environment before printing this email
**For information about what we do with personal
data see our [privacy notice](#)**