

30 January 2025

IC-353509-V7T7

Request

"The Information Commissioner's Social Media Policy says that it applies to "all employees, agency staff, secondees, contractors, non-executives and other workers of The Information Commissioner's Office."

<https://ico.org.uk/media/about-the-ico/policies-and-procedures/4021371/social-media-use-policy.pdf>

I would like to request recorded information held by the Commissioner on whether this policy applies to the Commissioner himself. As the same scope is attached to a number of the Commissioner's policies, if there is any recorded information about how policies in general apply to the Commissioner, I would be happy to receive that, as long as it was relevant to the Social Media Policy.

I don't want to anticipate your response unfairly, but to be clear, whether or not Mr Edwards chooses to comply with the policies that apply to his staff isn't relevant here. I want to know if the Commissioner holds information that confirms whether or not he is bound by the policy in the same way as one of his employees would be.

I would also like to request recorded information on why the policy has not been reviewed, despite the policy stating that a review should be carried out by December 2023."

We received your request on 3 January 2025.

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

Our response

In response to the first part of your request, we have conducted reasonable searches and can confirm that there is no information held.

We do not hold any information that describes what policies are or are not applicable to the Commissioner. The Commissioner is appointed by the Crown and is not an employee of the ICO.

In response to the second part of your request, we do hold one email that falls in scope. However, we are withholding it under section 40(2) of the FOIA. This is because the reason for the policy not being updated is the personal data of a member of staff.

We find that it would not be reasonable to disclose this information because it would infringe on the data protection rights of the relevant member of staff. We have considered whether we could provide it with names redacted. However, it would still be possible for the individual's identity to be inferred if it was in the public domain.

We are able to provide some context by way of advice and assistance.

The policy was in the process of being updated in 2023. However, due to staff absence and role changes the work was not completed.

The matter of the policy being out of date was raised internally in December 2024. This was then discussed in an email exchange.

We can confirm that the policy is now currently in the process of being updated.

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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