

5 July 2024

ICO Case reference: IC-313705-H7P9

Request for Information

Further to your acknowledgement of 18 June we can now provide a response to your information request.

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

We received your request on 18 June 2024.

Request

In your email of you said *"I wish to make the following FOI request:*

- 1. available information regarding the reasonable adjustments that can be given to users of your service,.*
- 2. what understanding is there from staff in adapting their responses and service offer to service users (examples are if not sure how to handle reasonable adjustment or make, what internal guidance can b sought etc.)"*

Response

With regards to the first part of your request, information about reasonable adjustments policy can be found on several pages on our website.

The reasonable adjustment policy can be found at [reasonable-adjustment-policy.pdf \(ico.org.uk\)](https://www.ico.org.uk/for-organisations/about-ico/policies-procedures/foi-reasonable-adjustment-policy).

[Our service standards | ICO](#) also provides a link to this policy.

The following link will also take you directly to our reasonable adjustment policy PDF [ICO service charter policy](#).

Because this material is already reasonably accessible to you it is technically withheld under Section 21 of FOIA. This exempts information which is reasonably accessible to that applicant through means other than the request under FOIA.

With regards to the second part of your request we have some additional internal procedures for handling informal service adjustments and training slides for staff on service adjustment procedures.

Please find attached copies of relevant presentation slides for training given to staff on reasonable adjustments procedures and a redacted word version of handling an informal adjustment procedure which covers requests reasonable adjustment requests.

You will notice we have redacted internal email address. This email address is not for public use and has been withheld pursuant to S.31 FOIA.

Section 31

We have withheld an internal email address under section 31(1)(g) of the FOIA.

We can do this when the disclosure of information *"would, or would be likely to, prejudice...the exercise by any public authority of its functions for any of the purposes specified in subsection (2)."*

In this case the relevant purposes contained in subsection 31(2) are 31(2)(a) and 31(2)(c):

" a. the purpose of ascertaining whether any person has failed to comply with the law, and

c. the purpose of ascertaining whether circumstances which would justify regulatory action in pursuance of any enactment exist or may arise."

Misuse of internal email addresses that exist to support ICO staff would likely prejudice our ability to perform our regulatory functions. Disclosure would leave us vulnerable to phishing or other cyber-attacks, spam, or an increased volume of irrelevant correspondence which it would take us time to process.

There are other channels that the public can use to contact us, and they are publicly available via our website.

The exemption at section 31(1)(g) is not absolute. When considering whether to apply it in response to a request for information, there is a 'public interest test'. We have to consider whether the public interest favours withholding or disclosing the information.

In this case the public interest factor in favour of disclosing the information is:

- Increased transparency in the way in which the ICO conducts its operations.

The public interest factors in maintaining the exemption are as follows:

- Internal email addresses being used inappropriately will reduce the effectiveness and efficiency of our regulatory functions.
- The information of primary relevance to your request is not affected by the redaction of our internal email addresses.
- The public interest in transparency is met by the public provision of other more appropriate means of contacting us.

Having considered all of these factors we have taken the decision that the public interest in withholding the information outweighs the public interest in disclosing it.

This concludes our response. We hope you find this information helpful.

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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