

20 July 2026

IC-530309-P0X7

Request

On 20 June 2026, you requested the following information in relation to the resignation of John Edwards:

- Who conducted the investigation?
- What were the exact terms of reference?
- Was the investigator entirely independent of the ICO?
- What behaviour was found to have fallen below the standards expected of a public official?
- Did the findings involve a single incident or a pattern of conduct?
- What recommendations were made?
- Were any recommendations directed at the ICO's culture, governance, or management practices?
- What role did DSIT play in overseeing the process?
- Will any part of the report be published?
- What lessons will be learned by the ICO and its successor organisation?
- Did the HR inquiry include the Nolan principles

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

Response

We hold information that falls within scope of your request and will address each point individually.

1. Who conducted the investigation?

Deborah Hely of D&C Hely Consulting Limited.

2. What were the exact terms of reference?

We have disclosed extracts from the Terms of Reference and the corresponding section of the investigation report. Some information is exempt in accordance with Section 40(2). Where this appears within the attached extracts, it is redacted. Other parts are withheld in entirety.

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

In terms of the legitimate interests test, we acknowledge there is a legitimate interest in understanding the investigation, particularly given the seniority of the individual whose conduct was under consideration, including how the investigator addressed this and reached their conclusions.

In terms of the necessity test, disclosure of the full report would reveal significantly more personal information than is necessary to satisfy the legitimate

interest in understanding the investigation and its outcome. It would be the most intrusive means of communicating information about this matter and likely to cause considerable distress to those involved.

We have published [updates on our website](#) and high level information about the process, nature and conclusions of the investigation which arguably satisfy the legitimate public interest in this subject without compromising the rights and freedoms of the individuals involved. Please also see our [disclosure log](#) for responses to other requests on this topic.

Although our view is that the necessity test for disclosure is not met, for completeness, we have gone on to consider the balancing test. We do not consider that the legitimate interests in disclosure outweigh the rights and freedoms of the individuals whose personal data appears in the report.

The information was gathered for the specific purpose of conducting the investigation. The majority of the individuals appearing in the report are a considered to be junior members of staff and they provided information about themselves and others with a reasonable expectation that their personal data would be used for that purpose and would not subsequently be disclosed into the public domain under FOIA, in line with our [employee information disclosure policy](#).

We consider that disclosure would be likely to constitute an unwarranted intrusion into the privacy of those individuals and would have unjustifiable adverse effects on them. It could reasonably be expected to cause significant distress, adversely affect working relationships, and discourage individuals from cooperating openly with future investigations. Furthermore,

given the high profile nature of this matter, disclosure of information which would identify individuals could lead to targeted contact and/or harassment from media or other individuals about the investigation, causing further harm and distress to those concerned.

Individuals may be identified either directly from the information itself or indirectly when combined with information already available elsewhere.

In these circumstances, we consider that the interests, rights and reasonable expectations of the individuals concerned outweigh the legitimate interest in disclosure. Disclosure would therefore not be lawful and the information is exempt under section 40(2) of the FOIA.

Some of the policies contained within the appendices of the report have been withheld in accordance with Section 21 of the FOIA as they are already available on our [policies and procedures page](#). The relevant policies are the [Code of Conduct](#), [Dignity at Work Policy](#), [Disciplinary Policy](#) and [Whistle Blowing Policy and Procedure](#).

Section 21 states that we don't need to provide you with a copy of information when you already have access to it.

Please note the Terms of Reference also includes four attachments. The first is withheld in accordance with Section 40(2) as noted above, whereas the other three are policies. These are exempt in accordance with Section 21 of the FOIA as they are already available on our [policies and procedures page](#). The relevant policies are the [Code of Conduct](#), [Dignity at Work Policy](#), and [Whistle Blowing Policy and Procedure](#).

Section 21 states that we don't need to provide you with a copy of information when you already have access to it.

3. Was the investigator entirely independent of the ICO?

Yes.

4. What behaviour was found to have fallen below the standards expected of a public official?

The allegations concerned sexual harassment, bullying and harassment, misuse of power, behaving in a threatening and inappropriate manner and the investigation found that there was a case to answer in relation to the allegations. Details about specific outcomes in relation to individual allegations have been withheld in accordance with Section 40(2) as this information constitutes the personal data of those involved.

5. Did the findings involve a single incident or a pattern of conduct?

The findings relate to multiple incidents.

6. What recommendations were made?

The recommendations made by the investigator are limited to those specified in the Terms of Reference and in section 1.5 of the report:

(i) That there is no evidence of a case to answer and no further action needed.

(ii) That there are some concerns that should be reasonably

addressed through informal and internal actions.

(iii) That there is evidence to support a potential breach of ICO policy and or ethical conduct.

As explained in [our statement](#), the report found that there was a case to answer as per (iii) and made clear that his behaviour fell short of the conduct expected from a public official. At the ICO, these standards are captured in our [Dignity at Work Policy](#), our [Code of Conduct](#) and through the [Nolan Principles of Public Life](#).

7. Were any recommendations directed at the ICO's culture, governance, or management practices?

As set out in the Terms of Reference and the relevant section of the report, the investigation was limited to the behaviour of John Edwards and any recommendations were limited to those described in Section 1.5 of that report. Therefore no information is held in relation to this question. Please also see the following responses from DSIT to similar questions below:

[Written questions and answers - Written questions, answers and statements - UK Parliament](#)

[Written questions and answers - Written questions, answers and statements - UK Parliament](#)

8. What role did DSIT play in overseeing the process?

The ICO commissioned an independent workplace investigation relating to John Edwards. As the Information Commissioner is accountable to Parliament, and not employed by the ICO, the next steps following this investigation were to be

determined by the Department for Science, Innovation and Technology (DSIT). DSIT accepted the Terms of Reference and were kept informed throughout.

9. Will any part of the report be published?

We have disclosed extracts from the Terms of Reference and the corresponding section of the report, as well as two policies included within Appendix C, with personal data redacted in accordance with Section 40(2) of the FOIA. There are no current plans to publish the remainder of the report and this is withheld in accordance with Section 40(2). Please note that some policies contained within the appendices have been withheld in accordance with Section 21 of the FOIA as they are already available on our [policies and procedures page](#). The relevant policies are the [Code of Conduct](#), [Dignity at Work Policy](#), [Disciplinary Policy](#) and [Whistle Blowing Policy and Procedure](#).

10. What lessons will be learned by the ICO and its successor organisation?

This is a query rather than a request for information. We cannot answer a query about what might happen in the future.

11. Did the HR inquiry include the Nolan principles?

Yes.

Please note that we have responded to a number of other requests on this topic and the relevant responses are published on [our disclosure log](#).

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

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Yours sincerely



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