

Reference: 01693177

Information Requests  
[information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)

2 November 2023

### Freedom of Information request: Right to know request

Thank you for your request for information concerning training related to antisemitism and other race and religious based discrimination from external bodies. Your request was received on 5 October 2023. We have considered your request under the Freedom of Information Act 2000 (the 'FOI Act').

#### Your request & our response

*I am seeking information regarding training related to antisemitism and other forms of race and religious-based discrimination that have been received by members of your organisation from external bodies.*

*Specifically, I kindly request the following information:*

*1. Has the Office of Communications received training on antisemitism from any of the following organisations?*

*\* Campaign Against Antisemitism*

*\* UK Lawyers for Israel*

*\* Board of Deputies*

*\* If the Office of Communications has received training on antisemitism from a different organisation, please provide the name of the organisation.*

We have not received any training from any of the groups noted above. However, individuals from the Campaign Against Antisemitism attended Ofcom's London office to provide an information session explaining the work of that organisation to a group of Ofcom colleagues.

In addition to this session, we have also received a presentation from the Woolf Institute in relation to its study of antisemitism online and held a Q&A session with David Baddiel following the publication of his book *Jews Don't Count*.

We do not consider that the events noted above constitute employee training however we have noted that these events cover the topic with which this request is concerned and are content to provide some further information in relation to these which is set out below.

*2. For each instance of training received from an external party, please indicate whether the training was provided free of charge or if there were associated costs. If there were costs involved, please specify the amount paid.*

The events noted at point 1 were provided free of charge.

*3. Please provide the name of the individuals who provided the training.*

We have been unable to locate the names of the individuals who provided the CAA information session and as such we do not hold this information. As is explained below, we believe this session took place in 2018 however, we no longer have access to the calendar entries and invites which would have held this information.

Notwithstanding this, if we did hold this information, we would be unable to provide the names of the individuals who presented the above events as we consider that this information would be exempt from disclosure under section 40(2) of the FOI Act. Section 40(2) of the FOI Act provides that personal information about persons other than the requester is exempt where its disclosure would contravene any of the data protection principles in the General Data Protection Regulation and the Data Protection Act 2018. Section 40 is an absolute exemption under the FOI Act and does not require a public interest test.

*4. Please specify the target audience for the training, including but not limited to:*

*\* All staff members*

*\* Management personnel*

*\* Caseworkers (dealing with complaints from the public)*

*\* Any other relevant group or category*

The session provided by the Campaign Against Antisemitism was provided to members of the Standards & Audience Protection Team and managers plus members of the legal team specialising in advice to the Standards & Audience Protection Team.

The presentation from the Woolf Institute was available to a wide number of colleagues including those working on online safety related matters and the Standards & Audience Protection Team.

The Q&A session featuring David Baddiel was available to all colleagues.

*5. On how many occasions has the training on antisemitism been provided to members of the Office of Communications?*

Please note the dates of these events below.

*6. Additionally, does your organisation procure or provide similar training programs addressing other forms of discrimination, such as anti-Black racism, Islamophobia, or other race and religious-based discrimination?*

### Colleague training

All colleagues undertake a mandatory compliance training session titled, *Respect, Diversity and Inclusion*. This focuses on the Equality Act 2010 and Ofcom's Dignity and Respect at Work policy.

In addition, we also provide and have made available training on *Inclusive Recruitment Development*. This training has two core elements:

- Fair and Effective Interviewing for Diversity and Inclusion
- Uncovering Unconscious Bias in Recruiting and Interviewing

### Other events

Separate to this employee training, we have also noted that colleagues in the Standards & Audience Protection Team attended a session on Islamophobia. As above, we do not consider that this session constitutes training however as it covers one of the topics noted at point 6 of this request we are content to provide some further information in relation to this.

*If so, please provide details regarding these training programs, including the names of organisations providing the training, associated costs, and who the training was provided to (all staff, management, caseworkers etc.).*

### Colleague training

The mandatory colleague training is provided internally and is compulsory for all colleagues.

Our *Inclusive Recruitment Development* training is currently provided via a LinkedIn Learning collection. Prior to launching the LinkedIn Learning on-demand development for inclusive recruitment, we provided quarterly in person sessions on the topic delivered by an external provider (The Clear Company). New hiring managers are required to undertake this training prior to being involved in recruitment.

We are unable to provide details of the costs associated with the provision of our colleague training as we consider that the disclosure of this information is exempt under section 43(2) of the FOI Act. This exemption deals with information that, if disclosed, would or would be likely to prejudice the commercial interests of a person or company. In applying this exemption, we have had to balance the public interest in withholding the information against the public interest in disclosing the information. Annex A attached to this letter sets out the exemption in full, as well as the factors Ofcom considered when deciding where the public interest lay.

### Other events

The session on Islamophobia was provided by an academic free of charge. We are unable to provide the name of this individual as we consider that this information is exempt from disclosure under section 40(2) of the FOI Act. The full details of this provision are set out in response to point 3 of this request.

*7. Finally, if your organisation received any of the above training, please specify the dates that the training was provided.*

The Campaign Against Antisemitism information took place in 2018. We are unable to give an exact date as calendar entries for 2018 have been auto-deleted from our system.

The Q&A session featuring David Baddiel took place on 17 June 2021.

The presentation from the Woolf Institute took place on 30 November 2021.

The Islamophobia presentation took place on 29 November 2022.

The mandatory training noted above is completed by all members of staff on an annual basis. Dates for completion of the *Inclusive Recruitment Development* training are attached.

If you have any further queries, then please send them to [information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk) quoting the reference number above in any future communications.

Yours sincerely

## Information Requests

If you are unhappy with the response you have received in relation to your request for information and/or consider that your request was refused without a reason valid under the law, you may ask for an internal review. If you ask us for an internal review of our decision, it will be subject to an independent review within Ofcom.

The following outcomes are possible:

- the original decision is upheld; or
- the original decision is reversed or modified.

### Timing

If you wish to exercise your right to an internal review **you should contact us within two months of the date of this letter**. There is no statutory deadline for responding to internal reviews and it will depend upon the complexity of the case. However, we aim to conclude all such reviews within 20 working days, and up to 40 working days in exceptional cases. We will keep you informed of the progress of any such review. If you wish to request an internal review, you should contact [information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. Further information about this, and the internal review process can be found on the Information Commissioner's Office [here](#). Alternatively, the Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

**Annex A**

<p><b>Section 43(2) of the FOI Act provides that:</b></p> <p>Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).</p>	
<p><b>Factors for disclosure</b></p>	<p><b>Factors for withholding</b></p>
<ul style="list-style-type: none"> <li>• Enabling the public to gain a better understanding of the commercial relationships between Ofcom and its suppliers and the nature of the services provided, and thereby increasing public confidence in Ofcom’s work.</li> <li>• Generally, there is a public interest in transparency of expenditure, especially if public money is involved.</li> </ul>	<ul style="list-style-type: none"> <li>• Ofcom contracts with a number of companies and has a financial relationship with them. Companies need to be confident that information relating to their business, such as information about them as an organisation or relating to their products or services, will not be disclosed if it would, or would be likely to, prejudice their commercial interests.</li> <li>• Ofcom continues to negotiate and procure products like those related to this request. To release the cost would put Ofcom in a detrimental position for future procurement and would undermine its bargaining position with potential suppliers. In addition, to release the amount Ofcom pays for a service could prejudice the commercial interests of the supplier – in that it would provide details of the supplier’s commercial relationships to its competitors or potential clients.</li> </ul>
<p><b>Reasons why public interest favours withholding information</b></p>	
<ul style="list-style-type: none"> <li>• We consider that, on balance, the public interest in withholding disclosure of the requested information outweighs the public interest in disclosing the information.</li> <li>• Ofcom enjoys a positive relationship with those companies it contracts with and procures services from. The release of information which would, or would be likely to, prejudice commercial interests into the public domain would impair both Ofcom’s relationship with providers of services, and adversely affect its commercial relationships. If suppliers could not be confident that such information provided by them to Ofcom would be withheld from disclosure, except in compelling circumstances, commercial activity may be impeded. Similarly, Ofcom’s bargaining position, and therefore ability to obtain value for money in services it contracts for, may be undermined in future negotiations if full details about the cost of these services were disclosed. These considerations go against the public interest in disclosing.</li> <li>• Weighing the issues presented, it is considered that on balance, the factors for withholding the requested information outweigh those for disclosing the information.</li> </ul>	