

ICO response to the
recent consultation
“Towards a 2020 vision
for information rights”

Introduction

We recently undertook a consultation on our document “Towards a 2020 vision for information rights” in which we considered what would be required of us in the future and what we might do differently ‘looking ahead, staying ahead’.

The consultation generated 41 responses. These were in the main from people representing organisations, either individually or as representative bodies; but some responses from individuals were also received.

Most of the responses were understanding of the pressures identified by the ICO and its proposed approach, although a need for greater detail or clarity as to what was proposed was highlighted by some.

The main theme of the responses related to EU and wider international legislation, issues and cooperation. Other themes related to data sharing, working with other regulators, privacy seals and accreditation, and the impact of technological changes.

Responses to questions we asked

1. Are the aims we have suggested for the next five years the right ones? Have we missed anything out? Have we included anything we should not have?

The consultation stated that the ICO will expect to:

- Educate
- Empower
- Enforce
- enable, and
- engage.

These aims met with reasonable support although some thought they were too vague.

The difficulty of regulating across national borders was highlighted, both in wanting a consistency of approach from different regulators and in wanting enforcement action to be taken against big multinational companies.

There was keenness for both enforcement action and for engagement. Enforcement needed to be consistent and fair, and engagement focused on properly understanding businesses and commercial pressures so that we respond proportionately to issues.

2. In meeting our aims the ICO wants to be outcome focused, agile, joined up, efficient, expert and responsible. Again is there anything we have missed out?

Joined up working with other regulators was welcomed as was more work to demystify data sharing.

There was support for our continuing to deal with individual data protection concerns; but at the same time respondents wanted the ICO to be responsive to the needs of businesses – in other words, for the ICO to be balanced in its approach.

In addition, the speed at which the ICO responds to complaints, enquiries and issues was also a concern. People want the ICO to respond quickly and with authority.

3. The Commissioner's introduction lists the challenges the ICO is facing over the next few years. Are these right?

Again respondents thought the challenges were about right, although the need for the ICO to keep up to date with technological change and to better manage cross border issues was again raised.

The challenge of ensuring government transparency and protecting people's privacy against government intrusion was also highlighted.

4. Does the document give a good overview of the way the ICO wants to develop and work? If not, why not?

In the main the document was thought to give a good overview, but some felt it to need more detail and clarity.

How we are taking forward the results of the consultation

We are adjusting the focus of our work in three respects:

- Learning more from casework and tackling system problems ahead of individual lapses.
- Working with other organisation and regulators to leverage the information rights message and to coordinate enforcement.
- Coordinating the development of trust marks and privacy seals.

Our new rolling [three year plan covering from April 2014 to March 2017](#) details the work we will be doing over the next few years.