

All staff briefing – Introducing the new commissioner

Suggested agenda:

1. Brief welcome to John and outline of the session – ■■■■
2. John introduction / opening remarks – John
3. Prepared questions – Both
4. Open questions – Both
5. Closing remarks – John

Prepared questions:

To kick start the session we've suggested 4 potential questions:

1. What are your first impressions of the UK and the ICO?
2. You'd shared in Twitter the kindness of strangers at Gatwick airport. I am sure that like me, many staff will be following your tweets. Whether that's a book review or your views on big tech – do you want to share some of your views about social media and how you use it?
3. I know that it's week 2, and so a little unfair to ask this of you, but what are your immediate priorities and areas of focus?
4. You've talked about a listening tour, whether that's with civil society, businesses and of course our ICO colleagues – what sort of questions do you have for us and how can we best engage and work with you?

Potential questions:

The following outlines potential questions you may receive from staff during the open Q&A.

There's 3 themes of questions, the first theme is about our work and your views about the approach you might take to it, the second is the ICO as an employer and again your views about that, and finally some potentially more personal questions about your achievements or where you plan to base yourself.

Likely questions from staff	Implications / suggested answers
Potential questions about our work:	
What is your view on the enforcement action the ICO takes? Should we be doing more or less? Will you be a carrot or stick Commissioner?	
What is your view of DP reform? Is this a positive review or will this dilute privacy in the UK?	
What's your views on FOI? Will you push to extend the law and for more money and resources?	
Have you hear about our complaint backlog? What are your views on this?	For information: There is a post covid-19 recovery plan in place and good progress is being made against that.
We know the consultation on international data transfers closed last year, what's your view on the privacy implications?	
How do you plan to work with government and parliament?	
We talk a lot about prioritisation of work. Do you plan to review the way we prioritise work? What are your immediate priorities?	
What changes do you want to make to the ICO? Will you change our structures? Do you plan to shake up ET?	
The constitution of the ICO might change meaning that we are no longer a corporation sole. Are you in favour of that change? What do you think that could mean for you personally or what are the implications for the ICO?	
From your previous perspective in NZ, what was the best or most impressive thing about the ICO?	

Likely questions from staff	Implications / suggested answers
Do you still think that Facebook isn't to be trusted? What are your views about our future relationships with the tech industry?	
As Commissioner, what changes would you like to see happen to the info rights landscape in the UK?	
People often find the balance of innovation and privacy difficult to find and some seem to think that it has to be one or the other, what's your view on that?	
Are you interested in adtech? Do you want to reinvigorate that work?	
You've said cookies don't pose a risk of harm. What would you like to see happen with the way we regulate cookie law/PECR?	
We know DCMS are pro-business and want to overhaul perceived DP barriers. Are you also pro-business? What is your view of this?	
You have experience of an "adequate" environment in NZ. Is there anything that concerns you with the current state of play in the UK in terms of maintaining adequacy?	
Regulating big tech is a constant challenge for us and other similar regulators. How do you think we should do it? Will you be pushing for more money and resources?	
We've had a lot of focus and resource on the Children's Code. Do you plan to continue that focus?	
Potential questions about the ICO as an employer:	
Car parking – we've been paying for it for two years and haven't used it. Can we have a refund?	█ to answer – this is part of the Our Ways of Working programme and I'll update you on the review that's underway.
How do you plan to work with the Trade Unions?	

Likely questions from staff	Implications / suggested answers
We've been working at home for 2 years and the cost of utilities is rising dramatically, should the ICO pay for our heating?	██████ to answer – this is part of the negotiations with the TUs and Sarah Lal and her team can update you further.
What do you think about us largely working from home? What are the arrangements like in NZ compared to the UK?	
Potential personal questions:	
What do you think has been your greatest career success?	
Where are you going to be based? London or Manchester / Wilmslow?	
In social media, you seem to be a trans ally. Do you think this is an issue that the Information Commissioner should be outspoken about?	
We saw that you were pinged by test and trace. Did you have to isolate?	
Have you had a handover with Liz? Are you keen to see her priorities through or do you want to start afresh?	

From: [John Edwards](#)
To: [REDACTED]
Subject: RE: V3: COMMISSIONER BOX - THURSDAY 09 JUNE 2022 **OFF SEN**
Date: 10 June 2022 10:59:11
Attachments: [image001.png](#)



- **BOX ITEM 4 – Pronoun blog**

- **Background:** [REDACTED] has provided a pronoun blog for your informal review. This has been sparked by some members of the Women’s and Allies Network following the blog on pronoun use. It has been reviewed by [REDACTED] and will go to the EDI Board for sign-off this week. The Board has seen early iterations of this version.
- **What do we need:** Your views on the blog
- **When do we need it by:** **Midday – Monday 13 June 2022.**

Approved

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Track changes enabled in case you want to make edits.

At the ICO, we are committed to the principles of inclusion, diversity and respect. We expect that our colleagues will role model and live by these principles day to day.

The true test of this though comes when things maybe aren't clear-cut or simple.

If we are to genuinely foster a diverse workforce, it is inevitable that there will be times when there are differences of perspective and potentially even competing interests.

The Equality Act 2010 recognises nine protected characteristics but there is no hierarchy between these and at times there is potential for rights to conflict – either in practice or in perception. A sign of organisational and individual maturity is how we manage this when it occurs, therefore diversity of perspective on issues should not be brushed aside because they are inconvenient.

While discrimination, bullying and/or harassment are never acceptable to us, having a different personal viewpoint on an issue is perfectly acceptable (if not inevitable) in a modern and mature workplace.

These differences in perspective were evident recently in response to a blog post from the Pride Network in November. The blog explored reasons why ICO employees might want to include pronouns within their email signature and many good reasons for doing this were explored within that blog.

However, we recognise that there are also legitimate reasons why a colleague may NOT wish to include pronouns in their own email signature. It should not be suggested that this makes them any less supportive of trans colleagues or service-users.

It has always been the case that ICO colleagues are free to include their pronouns in their email signatures and to ask colleagues to refer to them in that way. We believe it is personal choice and that it would go against the creation of an inclusive environment to mandate or insist colleagues do so. As such, the ICO neither encourages nor discourages this practice and there is no organisational advantage or disadvantage to anyone adopting this approach, or not.

At the ICO principles of inclusion, diversity and respect are non-negotiables. All colleagues must recognise that rights and responsibilities in these areas go together for themselves and for others. Inclusivity is for everyone not just for certain issues and we sometimes must accept that this will bring tensions that we have to navigate sensitively. Only by

raising our awareness and understanding of these issues and their implications will we achieve sound judgements, appropriate behaviours and an authentically and sustainably inclusive working environment.

EDI Board

From: [John Edwards](#)
To: [REDACTED]
Subject: Inclusivity
Date: 22 November 2022 09:25:00

Hi [REDACTED]

You may have noticed that a routine @ICONews tweet acknowledging Transgender Day of Remembrance has attracted a flurry of anti-trans responses.

It has got me thinking – do we have any gender neutral bathrooms, or spaces for trans or non-binary staff and visitors?

Thanks



John Edwards (He/Him)

Information Commissioner

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

T. [REDACTED] F. 01625 524510 ico.org.uk

twitter.com/iconews

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If you wish to submit an information request or want to exercise any of your data protection rights, please forward your email to the Information Access Team at accessicoinformation@ico.org.uk, or you can call us to make a verbal request relating to your personal data on our Helpline 0303 123 1113.

For information about what we do with personal data see our [privacy notice](#)

From: [REDACTED]
Subject: Strategic media monitoring - Wednesday 26 April 2023
Date: 26 April 2023 09:09:24

Good morning
Please see below today's media monitoring.
Kind regards

[REDACTED]
ICO in the news

Data watchdog rebukes Monzo after gender-critical man called 'horrible Terf' by staff

Daily Telegraph, 26/04/23, Ewan Somerville

A report that the ICO has issued "a rebuke" to Monzo, after an individual issued a subject access request to the bank and saw that staff were having critical conversations about him. The subheading of the article correctly states that we have written to the bank asking it to review and strengthen internal procedures and staff training. The piece goes on to quote from a letter we sent to the data subject saying we had written to the bank. It concludes with a statement from Monzo saying it will continue to evolve policies at the bank.

[REDACTED]

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

Press office 0303 123 9070 ico.org.uk twitter.com/iconews

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From: [John Edwards](#)
To: [REDACTED]
Subject: RE: Potentially High Profile Request: ICO observance of Transgender Day of Remembrance
Date: 13 December 2022 15:11:00

Thanks [REDACTED] – I see we have been quite selective about the redaction of staff names, and I’m not sure why? I wonder whether we should take a uniform approach and redact all staff names from the attached documents, given the level of online abuse anyone associated with transgender issues receives?

John E



John Edwards (He/Him)

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

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From: [REDACTED]
Sent: 13 December 2022 10:07

To: [REDACTED]
[REDACTED]

Subject: FW: Potentially High Profile Request: ICO observance of Transgender Day of Remembrance

We are now ready to respond to this request from Maya Forstater. Please find attached our response and disclosure. We are confirming that we do not hold anything in relation to question 3. Please let me know by COP Wednesday 14 December if you have any issues to discuss.

Thanks



[REDACTED] Risk and
Governance Department

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

[REDACTED] F. 01625 524510 ico.org.uk

twitter.com/iconews

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Please consider the environment before printing this email

From: [REDACTED]

Sent: 22 November 2022 17:02

To: [REDACTED]

Subject: Potentially High Profile Request: ICO observance of Transgender Day of Remembrance

This is to let you know that we have received a potentially high profile FOI request regarding the ICO's observance of Transgender Day of Remembrance from a prominent gender critical campaigner.

Date request received by ICO: 21/11/2022

Date request received by IA: 21/11/2022

Date response due: 20/12/2022

The request reads as follows:

"ICO news tweeted

Transgender Day of Remembrance is a day to remember those who have lost their lives due to transphobic violence. It's a day to reflect on how we can work together to end gender-based violence, harassment and discrimination in all their forms.

<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftwitter.com%2FICOnews%2Fstatus%2F1594313402662678528%3Ft%3D-CytfbI2ADKwigA9nYP2cw%26s%3D19&data=05%7C01%7Cicoaccessin%40ico.org.uk%7Cc1926476c4f14e9cc25408dacc081dda%7C501293238fab4000adc1c4cfefba21e6%7C1%7C0%7C638046632477449962%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C2000%7C%7C%7C&sdata=ep8an1r98JrHoF3a314%2Bf4ry0MgRImq4JexKey7fIWE%3D&reserved=0>

Please supply

- 1) internal and external communications that led to the sending of this tweet*
- 2) ICO's policy on endorsing and publicising campaigning days*
- 3) Details of the people who have lost their lives to transphobic violence in the UK in the past 5 years*
- 4) Any internal corporate communications promoting Transgender day of remembrance in 2022"*

Please supply

- 1) internal and external communications that led to the sending of this tweet*
- 2) ICO's policy on endorsing and publicising campaigning days*
- 3) Details of the people who have lost their lives to transphobic violence in the UK in the past 5 years*
- 4) Any internal corporate communications promoting Transgender day of remembrance in 2022"*

This is not a consultation. If we need to consult with you or any members of SLT in the course of handling the request, then we will do that separately.

We will send a copy of our response to this distribution list when it is complete. Unless otherwise stated, this will be for information only. If you would like to discuss this request, please contact me, or one of the IA managers.

Thank you

Logo



[REDACTED], Risk and Governance Department

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

[REDACTED]. 01625 524510 ico.org.uk

twitter.com/iconews

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From: [REDACTED]
To: [John Edwards](#)
Cc: [REDACTED]
Subject: V3: COMMISSIONER BOX - THURSDAY 01 JUNE 2023 (OFF SEN)
Date: 01 June 2023 17:05:47
Attachments: [image001.png](#)

Hello John,
Please see your Thursday box below.
Thank you,

[REDACTED]

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

M. [REDACTED] W.ico.org.uk T. twitter.com/iconews

Commissioner Box deadlines: Tuesday and Thursday *12pm*

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[REDACTED]

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ITEM D: Manager's Briefing - Accessibility and reasonable adjustments at work May 23

- **Background:** [REDACTED] has emailed all people managers to provide a copy of the updated Reasonable Adjustment at Work Policy (item B) and a People Manager's Toolkit (item C) for supporting colleagues with a disability and neurodivergent colleagues. Also provided is a Manager's Briefing (item D) which details the changes we have made to the policy, introduces the toolkit and provides details of actions we have taken to improve our approach to reasonable adjustments.
- **What do we need:** N/A – for information only.
- **When do we need it by:** N/A – for information only.

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Manager's Briefing

Accessibility and reasonable adjustments at work

26 May 2023

What you need to know

As part of our commitment to continually review our policies and procedures we have made some changes to the Accessibility and reasonable adjustment at work policy. We hope these changes will provide assurance that we are responding to feedback, and concerns raised and are taking steps to help improve our approach to reasonable adjustments.

The key changes are as follows;

- Completion of the passport is voluntary and although completion is encouraged, we have included further guidance on dealing with reasonable adjustment requests without the completion of a passport.
- We have removed explicit reference to trans and gender reassignment as this will be covered in a new Trans policy due to be socialised in the next couple of months.
- Extended the policy to cover caring responsibilities with a definition for guidance. Extending this policy to cover caring responsibilities brings underrepresented elderly care benefits more in line with childcare.
- Updated the procedure and flow chart which includes the appointment of a 'single point of contact' being assigned to manage individual requests.
- Included a new section setting out roles and responsibilities highlighting your role as people managers in being key to creating an inclusive culture and your duty to support your staff.
- Included details of how to escalate concerns with the process or dissatisfaction with adjustments implemented.
- Updated the review process once the reasonable adjustments are in place from 12 months to 3 and 6 months and annually thereafter.
- Introduced a new section to provide clarity how to manage changes to circumstances, job role or location with further guidance on responsibilities.

- Introduction of a 'confidentiality,' 'records and monitoring' and 'further guidance' sections. These sections aim to give reassurance to employees on the governance of the information provided in the passports.

People manager's toolkit

We have produced a people managers toolkit for supporting colleagues with a disability and neurodivergent colleagues. It is hoped the toolkit will supplement the Accessibility and reasonable adjustments at work policy whilst providing more detailed guidance on the approaches and techniques needed for making appropriate reasonable adjustments.

The guide provides practical hints and tips along with frequently asked questions. We hope the toolkit will bring to life the process in the policy and give guidance on types of reasonable adjustments, the key stages of the process and how to get the most out of conversations with your team members.

What else have we done?

As part of the Civil Service Expert HR hub, we have consulted and compared our policy to those used by other UK regulators such as Ofgem, ACAS and the Department of Social Health. Our policy compared favourably and was in line with best practice across the other regulators. Our focus now will be directed on the implementation, cultural element, and wider appreciation for accessibility, to ensure the success of this policy and a fully inclusive working environment where all our employees can thrive.

Whilst we were not able to put definitive service level agreements in the Accessibility and Reasonable Adjustment Policy (as each workplace adjustment is different and timeframes are influenced by external stakeholders) we have created a fully documented case review log which is used by the Inclusion and Wellbeing Team to track progress of all workplace adjustment requests and provide anonymised quarterly reports to the DCEO and EDI board.

We have developed two 'Knowabouts' looking at Workplace Adjustment Passports. One for People Managers, and one for the individuals to help develop our culture of understanding.

We have completed a review of the People Services induction process to include a specific slot for the Inclusion and Wellbeing team. This provides a further opportunity to emphasise the importance of new starters declaring disabilities at an early stage and to raise awareness of the provision of support available via workplace adjustments.

Workplace Adjustment Group

We have set up a Workplace Adjustment Group to provide proactive oversight on the implementation of the Accessibility and reasonable adjustments at work policy and workplace adjustment passports. The group will also provide oversight and guidance on supporting our use of assistive technology, proactively providing advice on the procurement of new services and technology and reviewing activities or practices which create a barrier to the inclusion and wellbeing of our colleagues.

The working group consists of key stakeholders in the workplace adjustment process and include; the Head of Organisational Development and Capability, Inclusion and Wellbeing Business Partner, Inclusion and Wellbeing Team manager, Head of Facilities and Estates, Head of PMO, Head of Digital and IT Services and Head of Procurement.

The group will meet monthly, the dates of meetings, agenda and action plan will be published.

What you need to do

Please read the updated policy and toolkit and discuss the content of this briefing with your team members.

More information

If you require any further information, please contact the Inclusion and Wellbeing Team [REDACTED]

From: [REDACTED]
To: [John.Edwards](mailto:John.Edwards@ico.org.uk)
Cc: [REDACTED]
Subject: COMMISSIONER BOX - THURSDAY 08 JUNE 2023 (OFF SEN)
Date: 08 June 2023 18:02:27
Attachments: [image002.png](#)
[image003.png](#)

Hello John,
Please see your Thursday box below.

Thank you,

[REDACTED]

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

M. [REDACTED] [W.ico.org.uk](http://www.ico.org.uk) T. twitter.com/iconews

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THURSDAY COMMISSIONER BOX CONTENTS

08/06/2023



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People Managers briefing

07 June 2023

Hello and Welcome

- Reiterate the aim of these briefings
- To make clear your responsibilities as people managers to support and challenge your teams to achieve high standards of performance.
- To feedback and ask questions



Today's agenda

EDI Objectives

Pay and Reward update

People Policy update

PDR next steps

High Performance Strategy -
Listen in series

Coming soon

Actions for People Managers



People Policy update

Newly updated policies

- [Accessibility and Reasonable Adjustments at work](#)
- [People managers toolkit](#)

Coming soon.....

- Maternity Policy
- Secondary Carer Leave Policy
- Flexi-time Policy
- Menopause
- Trans Policy and Guidance





Impact of data breaches on victims-survivors of domestic abuse

Delivery timings:	w/c 18 September
Account manager:	[REDACTED]
Strategic lead:	[REDACTED]
Sign off trail:	[REDACTED]

Objectives

- Call attention to the impact of personal data breaches on victims of domestic abuse.
- Encourage organisations to improve their data protection practices to avoid inappropriate disclosure of people's information.
- Demonstrate how we are protecting the public (reprimands), especially those who are vulnerable such as victims-survivors of domestic abuse, when their personal information is not handled appropriately.

Scoring/evaluation

- Volume, sentiment and quality of media coverage (incl. key message penetration and share of voice for the ICO)
- Engagement (views, likes, shares and comments) on media coverage and social posts
- Google trends and social discussion data to track if there is an uplift in searches for related terms/discussion around key topics
- Visits to the key pages on the ICO website – press release, reprimands, guidance
- Volume of inbound enquiries / calls to helpline on this topic to the ICO
- Feedback from partner organisations (e.g. charities) on any changes in volume or type of enquiries related to the campaign

Audiences and insight

Main audiences

1. **Public sector** (specifically local government, police, health, education, housing association)

2. **Victims-survivors of domestic abuse, wider public** – UK stats:
 - a. 1 in 4 women and 1 in 6 men experience domestic abuse in their lifetime (please note, this standard data has been used since at least 2014; this type of data is difficult to come by and is under-represented)
 - b. 25% of lesbian and bisexual women have experienced domestic abuse in a relationship (Stonewall, 2017)
 - c. Almost half (49%) of gay and bi men have experienced at least one incident of domestic abuse from a family member or partner since the age of 16 (Stonewall, 2017)
 - d. 80% of trans people have experienced emotional, sexual, or physical abuse from a partner or ex-partner (Scottish Transgender Alliance, 2010)
3. **Charity sector and civil society groups** (examples: Refuge, Women's Aid, Solace Women's Aid, Galop, Stonewall, Rainbow Project NI, Southall Black Sisters, Men's Advice Line, Respect, Karma Nirvana)
4. **Regulators and victims' advocates** (examples: Citizens Advice, Domestic Abuse Commissioner for England and Wales, Victims Commissioner for England and Wales, London Victims' Commissioner, Scottish victim's taskforce, Surviving Economic Abuse)

Background and insight

Citizens' Advice report 'On the receiving end'

In February 2020, Citizens' Advice (CA) [published a report](#) about how victims-survivors of domestic abuse face significant harm because their post isn't secure, and their address is regularly disclosed. Key highlights:

- 40% of victims-survivors have had their new address disclosed to the perpetrator by an agency.
- Half (52%) of victims-survivors with children, who left the home where the abuse took place, experienced an agency disclosing their address to a perpetrator.
- 71% of victims-survivors felt their safety was compromised as a result of an agency disclosing their address.
- Half (51%) of victims-survivors avoid engaging with services because they don't want to give out their new address. This fear of disclosure ultimately prevents victims-survivors from accessing the support they need and rebuilding their lives.
- Many victims-survivors said the service providers they interact with are either careless or unaware of the risks associated with disclosure.
- Victims-survivors also encounter agencies' systems that make it difficult to keep addresses secret.

One of the CA report's recommendations was for the ICO to investigate the significant number of data breaches put victims-survivors of domestic abuse at serious risk. At the time, a tactical TCG was commissioned to determine the most effective way to consider this matter. But the COVID-10 pandemic struck and ICO resources had to be deployed elsewhere.

ICO work on the impact of data breaches on vulnerable people

Most recently, Regulatory Policy Projects has been exploring the impact and data protection harms which data breaches have on vulnerable individuals. The project engaged with departments across the ICO to understand the prevalence of this matter (based on reported cases), to determine the systems and processes used to identify and respond to cases involving vulnerable individuals, and to consider the information provided by the ICO to individuals and organisations. Highlights:

- Between 22-28 January 2022 (one week), the ICO received 223 PDB reports, of which 11 related to breaches that affected victims of domestic abuse (5% of PDB reports received that week).
- Since January 2022, we issued 47 reprimands, with six being related to breaches that affected victims of domestic abuse (12% of reprimands issued).
- Human error was identified as a factor in most cases.
- While these figures may be considered by some to be insignificant, the potential impact to individuals is likely to range from fear, revisiting trauma, and having to move home / schools / jobs again.

Project's recommendations

- Identify and record vulnerability on PDB reports.
- Acknowledge vulnerability in our communication with organisations.
- Acknowledge vulnerability in our guidance.

Comms messaging

People need confidence in their privacy in order to participate in society - to share their personal information to access services, confident their information rights will be respected. That is particularly true of vulnerable groups who have no choice but to share their information with organisations in order to be able to access services and receive the support they crucially need.

Our messaging will highlight the impact that personal data breaches can have on victims of domestic abuse. We'll showcase real-life examples of potential or real impact, for example when the inappropriate disclosure of people's information meant that they needed to find emergency accommodation or that their life became a risk because of the breach.

We also want organisations to improve their data protection practices to avoid such data breaches from happening in the first place. We will provide advice to organisations that handle this type of data so people's information is safeguarded.

Draft press release: [DRAFT PDB impact victims domestic abuse - press release.docx](#)

Risk: There's the risk of criticism of our public sector approach. These cases put women's lives at risk and people may criticise us for 'only' reprimanding these organisations and not fining these organisations. And the criticism could come from the women's charities, too. We'll need to source any tangible examples / evidence on how the public sector approach is working.

Strategy/idea

Strategy

We'll split our approach into two streams, to reflect the different audiences:

1) Improving data protection practices among organisations that deal with personal information of victims-survivors of domestic abuse

Media:

- Press release on ICO website sent to targeted trade press for each of the main public sector audiences (local gov, health, police, education, housing associations) – eg Local Government Chronicle, The MJ, Police Professional, National Health Executive, UK Authority, Social Housing Magazine.
- Tailor example reprimands for different titles eg. NHS example for health sector, South Wales Police for law enforcement.
- Include third sector/charity titles.
- Regional titles targeted, based on the reprimand examples eg. Bolton, Dorset, South Wales, Wakefield.

Social media and online:

- **Best practices LinkedIn campaign** – A social media campaign focussing on ICO's LinkedIn. Content would include examples of how organisations can improve their practices eg the small steps they have taken to improve their training, or staff awareness and how this has impacted the way they handle DV data.

2) Highlighting our work to victims-survivors of domestic abuse and wider public**Media:**

Tiered approach, divided into:

1) Early pitch to flag upcoming release and encourage to find case studies

- Journalists who have previously covered domestic abuse and dp breaches/issues, or domestic abuse generally, in advance of the press release to give them time to find own case studies: Shanti Das at The Observer, Louise Tickle at the Guardian, Moya Crockett (Freelance), Maya Oppenheim at The Independent, Lucy Morgan and Ali Pantony at Glamour, Lucy Adams at BBC Scotland, Claire Ellison at BBC.
- Target women's lifestyle magazines/weeklies that have a large, predominantly female readerships: Grazia, Stylist
- Pitch op-ed to [The Independent which has a year-long partnership with domestic abuse charity Refuge](#) – looking to raise awareness and funding for Refuge's work (including National Domestic Abuse Helpline) via commercial and editorial initiatives

2) Bespoke pitch on the week of the press release publication, seeing if they'd like anything further

- Independent titles championing women's issues eg. The Female Lead, Black Ballad, Bricks.
- LGBTQ+ titles eg. Pink News, Attitude, Diva, Gaydio
- Potential new audience outlets: Speak to Shado Mag ('a community of journalists fighting for social justice') to explore option of featuring our work on their site, eg on their [Knowledge Pages](#) or podcast. Also [Amaliah](#) ('amplifying the voice of Muslim women') to explore possible content on their site eg under Relationship section.
- Contact Reach shared content unit about possibility of distributing to their regional journalists and encouraging them to regionalise it by contacting local domestic violence charities for quote.

3) Simple press release send on the day

- Other women's lifestyle magazines/weeklies that have a large, predominantly female readerships: Elle, Marie Clarie, Woman & Home, Good To. Also women's tabloids eg. Closer, Yours, Prima, Bella. Tyla (female-focused brand from LadBible).

Social media and online:

- **An awareness social media campaign, "It's not just data"**. Images that use the case studies from reprimands but focussing on the personal story and how the mistake impacted their life. This would be shared on ICO owned channels and with target partner organisations.

Stakeholder engagement – securing supportive voices:

Northern Ireland

Organisation	Contacted (Y/N)	Response
Women's Aid NI	Y	We have been in contact about the campaign and they have shared the ask with their team leaders to see if they have any case studies they could share with us. However, no response yet.
ASSIST NI	Y	N
Cara Friend NI	Y	N
The Rainbow Project	Y	N
Victim Support NI	Y	N
Nexus NI	Y	N

Wales

Organisation	Contacted (Y/N)	Response
Welsh Women's Aid	Y	
BAWSO	Y	
Umbrella Cymru	Y	
Safer Wales	Y	
Stori Cymru	Y	

Scotland

Organisation	Contacted (Y/N)	Response
Scottish Women's Aid	Y	
Victim Support Scotland	Y	
Abused Men in Scotland	Y	

National LGBT Domestic Abuse Helpline	Y	
Shakti Women's Aid	Y	SRO met with Shakti about this and PACE project. Were supportive of a comms campaign and agreed they would be happy to help.

England

Organisation	Contact (Y/N)	Response
Women's Aid	Y	Positive meeting. Very supportive of the message and would be happy to help. They'd like to see the content prior to agreeing on the level of support.

Implementation

Timing	Action	Owner – a/c manager to make sure this happens	Notes

Comms plan essentials

Consultee (can we have check box)	Notes
Stakeholder engagement: POC RMS ICOR (for regional issues/terminology/translation) PGA SME hub SCOPE group DSIT comms	
Internal comms	
Data reform (Seema Mistry)	