

Impact by Design

Background

Our current approach to business planning helps us to describe our planned work, but general feedback from ET, leaders and teams across the organisation has highlighted that the process can be siloed, inconsistent, and disjointed.

It is not driven by a strong prioritisation methodology or agile mindset. It is also perceived by many as simply a tool for managers and leaders and is not relevant to our day to day work. A sense of clear ownership and accountability for delivery of ICO25 is lacking.

By October 2024, in the target operating model, we have committed to business planning being owned collaboratively by leadership across the organisation and with us prioritising and measuring results by outcomes.

By October 2025, we have committed to there being a culture of time box delivery across the ICO. Modern and agile business planning will mean leaders can stop, start, and continue work more effectively.

Our aim is to reframe and reinforce the purpose and function of business planning in the year ahead so that all areas of the business can describe how they are making an impact against ICO25 commitments.

New approach

We will refocus our attention in the business planning process so that all areas of the business put the impact of our work, as opposed to the activity that we undertake, front and centre.

The organisation is asked to bind behind a number of strategic, or important work themes and areas, our key "causes".

For 2024/25, these will be:

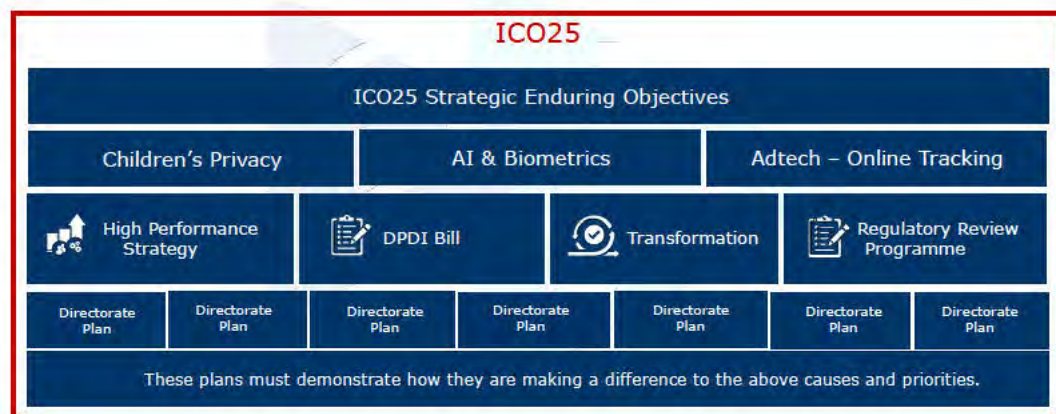
- Children's Privacy
- Artificial Intelligence and Biometrics
- Adtech – Online Tracking

These key causes are areas of work that are broad enough to be cross cutting and allow the various directorates to consider how they can deliver impact against them. However, they will be focussed enough to not encompass everything or anything that is business as usual. They can assist and provide clear direction when Directorate or Departments need to prioritise or re-engage with stop, start or continue. Our aim, at the end of 2024/25 is to be recognised as having made a positive difference against these strategic causes.

Business plans should consider the method or the way in which impact can be generated and that consideration forms part of the new planning process for the directorates going forward.

This image illustrates how these "causes" will sit and how they relate to other significant priorities that we have already identified as part of our strategic considerations for 2024/5.

High Level Visualisation



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Whilst we have highlighted a number of overarching "causes", we still expect Directorates to consider how they can report impact against existing priorities, such as the impact of DPDI implementation, activity related to the High Performance Strategy or the activity associated with the Regulatory Risk Review, where they are able to do so. Our aim is ensure we describe the impact we have had on organisations, on individuals, or our own ability (our capability and capacity) and show how we make a difference.

Why change?

We want to ensure that impact against our strategic enduring objectives and priorities areas of improvement or delivery are driving our planning. Also, that we're ensuring horizontal alignment across the organisation. We still need to plan our activity and measure how we are doing, but there is a great opportunity to highlight how the work we do delivers impact and improvement. We want to tell that story whenever we can do.

What are we changing?

Rather than simply describe all the activity that we're going to undertake during the year, we ask Directors and directorates to report on the impact they are delivering quarterly.

Not all of the impact that will be described will fall under the key causes that have been identified but we expect that the majority of issues or activities will do. We also expect that directorates will recognise the need to ensure they are aligned and working together to ensure we have the capacity to deliver our key priorities collectively. These areas of impact are the work that we expect directorates to resource first.

We ask directorates to re-frame their reporting arrangements so that they identify impact stories or transformational activity and are able to articulate that at the end of each quarter.

At the end of each quarter, we will expect each directorate to complete an impact based survey which describes the difference that their work has made in relation to the identified causes, and those key priorities that help us deliver ICO25.

Support

The ET/SLT away day in November was focussed on making an impact, with specific activities related to outside in perspectives, empathising with stakeholders, aligning behind causes, impact assessments, and compelling storytelling.

Impact Planning was described to SLT /SLB in December with a high-level pitch to share the emerging thinking.

Impact Planning was revisited in January's SLT.

An updated business planning template and accompanying guidance will be published by 1 February.

Economic Analysis colleagues are running several 'Theory of Change' training sessions for Directors and Heads of Department during February, focusing on how it can be applied at the ICO and more specifically to the business planning process. Please book your slot! [Workday - Theory of Change for Level G and above](#)

Our Prioritisation and Intelligence colleagues continue to provide guidance and support [Prioritisation](#) [Intelligence](#).

This change of approach will also link in with benefits realisation work being developed by the Project Management Office (PMO).

At the March ET/SLT away day, objective setting, causes and impact planning will all be covered.

It is hoped that these activities will help lay the foundations for this reframed business planning process. This approach is new, therefore we will learn as we go, and provide further support where required.

How will we make our impact more visible?

At the end of each quarter, we will develop a new impact report. We expect this to be similar to the bi-monthly reporting that documents and describes some of our external communications activity.

This will be a product that can be recorded and shared with the entire organisation internally, then shared with our external stakeholders or even published externally to demonstrate the way in which we are making a difference.

How does this fit with regulatory risk and the future?

We have already described in the regulatory risk review project that our aim is to set out the broad priority themes we are choosing to prioritise in any given period (typically a year).

Whether an ET member or a Case Officer, we should be able to justify our investment of effort/resource based on their alignment with these priorities. Our regulatory governance arrangements would also be tracking our impact and co-ordinating our allocation of resources (at all tiers of our regulatory portfolio, to progress these priorities).

Done correctly, our plans should be a set of hypotheses that we measure our success against, from an external perspective. It is a way to forward look and ensure that we are not simply reporting outputs and the work that we have completed but instead ensures that we are continuously planning to make a difference and holds all areas to account.

We will ensure impact planning is built into our Do it Differently Culture Programme and already have links into our Leadership Development Proposition.

Leaders will be able to use narrative and storytelling to articulate the impact being made during the year and we will build on more measures and better ways to articulate our value in the future.

As we focus on impact planning there is an opportunity to reinforce our benefits realisation work and do more to quantify the value of our impact in the future. We recognise that we are not yet experienced enough as an organisation to have impact baselines in place, or to have impact reporting and know how this looks in its entirety across all functions of the office, but we will collaborate with others to develop our approach during 24/25.



BLOG

Joining the dots to help us understand how we belong at the ICO

Paul Arnold
Deputy Chief Executive

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We have a lot going on, and I know it can be challenging to see how it all fits together and to understand how our personal contributions are making a difference. We have strategies, action plans and transformation portfolios, but how do they all connect? I thought I'd take the opportunity to, hopefully simply, try to answer this really important question and to help us all to channel our efforts in ways which make the greatest difference. So here goes...

Joining the dots

If there were just four things I'd encourage us all to keep at the forefront of our minds they would be:

- Our [One Purpose](#) - the reason why we are all here;
- Our [Three Causes](#) - what we are prioritising to make the greatest impact;
- Our Five Transformation Programmes - how we make sure we keep improving and remain relevant for the future; and
- Our Personal Opportunities to "Do it differently" - our individual contribution to the future ICO.



Photo of Paul Arnold

One Purpose

Belonging at the ICO is all about our shared purpose. This is to empower people through information. We have four enduring objectives we work towards together to help us achieve this: to [safeguard and empower people](#), to [empower responsible innovation and sustainable economic growth](#), to [promote openness and transparency](#), and to [continuously develop our culture, capability, and capacity](#).

Everything else flows from this shared purpose and objectives.

Three Causes

As we often say, we are a 'whole economy' regulator. This means there will always be more potential things for us to invest our time and resources in when working towards our purpose than we have time and resources to invest. This isn't anything new or even a problem. Back in the early 2000s we used to talk about being 'selective to be effective'. In our [ICO25 shifts of approach](#) we talk about needing to prioritise with simplicity and agility. Prioritising stuff basically needs to be something we are great at and do all the time. As our remit becomes increasingly complex, so our approach to prioritisation needs to keep evolving too.

We need to be able to simply and transparently decide which harms we are going to focus on and, by extension, the things we are going to give less focus to. I know that can be an uncomfortable thing for us to acknowledge. In an ideal world we would want to be able to prioritise all legal infringements and to be able to support all responsible businesses equally. But that's just not possible.

To help us to make a deeper and longer impact with our work we have set high-level priorities. They reflect the areas we believe need our attention the most and why. We are calling these our [three causes](#):

Children's privacy – There is a risk that social media and video sharing platforms are not always acting in the best interests of children when capturing and processing their data.

AI and biometrics – In the rush to adopt new, transformative solutions there is a risk that data protection considerations are being overlooked and that the public will lose trust in those services.

Adtech – online tracking - There is a risk that people's rights are not reflected or respected in the design of the personalised advertising systems that support the business models of online media and ecommerce of the internet.



Three children on mobile phones

These causes don't represent 'extra' work. They are things we are prioritising. There will be things we will stop doing to create the space for our causes to receive our full attention, with our causes becoming the first thing we plan for each year. Our causes will never represent 100% of our work. There will always be stand-alone issues we need to respond to. But our aim is that the majority of our discretionary effort will be aligned to our causes. We also want at least 50% of our overall time and effort as an organisation to be focused on proactive regulatory activity, preventing harm before it happens rather than reacting to it after the event.