

IC-341197-W3P2

Correspondence and documentation regarding
the changes to the ICO's Business Advice
helpline

Equality Impact Assessment (EqIA)

This document fulfils the ICO's requirements to conduct Equality Impact Assessments, as a requirement to have due regard under the Equality Act 2010, S75 of the Northern Ireland Act 1998 and the public sector equality duty. This document helps you to assess the equality relevance of a policy or procedure on one or more groups of people with protected characteristics. Guidance is also available for Equality Impact Assessments (EqIAs), along with a glossary of issues to consider. The purpose of an EqIA is to ensure that equality issues are identified and mitigated. The guidance and 'issues to consider' documents are intended to assist with this, but they are not a substitute for consultation with people with lived experience of any of the protected characteristics. Therefore, you should, wherever appropriate, consult with the relevant EDI staff networks or other colleagues to discuss potential impacts.

You must read the [guidance](#) and [glossary of issues to consider](#) before completing the document.

Completed EqIAs will be published [on the ICO's website](#).

Summary

Prepared by: Suzanne Gordon, Director of PADPCS

What is the title of this piece of work? Business Advice channel shift project

Briefly describe the overall purpose of this work. Aligned to the Customer Service Strategy and Workforce Strategy, we are exploring opportunities to do things differently, embracing a digital first approach. From 11 October 2024, for a three month period, we plan to run a pilot which will see our business advice customers who contact us via the helpline, as their first port of call, being channel shifted to the ICO website to start their journey there. Business Customers will be presented with

some additional digital tools to help them self-serve and there will be the option of emailing in complex enquiries or engaging with ICO staff via live chat, if they cannot find the information they are looking for. We will continue to operate live chat between the hours of 9am-5pm, and there will be the option of making an outbound call to the customer, if this approach would help resolve the enquiry.

For customers who require telephone contact because of accessibility needs, in line with the Equality Act, we will maintain a phone line open for them. We will do this by changing the IVR on the 0303 123 1113, so that there is an option for customers requiring a Reasonable Adjustment to stay on the line and an ICO case officer will help them resolve their enquiry.

Initial screening questions

Q1. Does this work relate to an ICO policy, procedure, working practice or anything broadly similar? This includes both current policies and new policies under development.

Please answer YES

*If you answer **No** to this question, you may not need to complete a EqIA.*

Q2. Is this work about the explanation of the laws which the ICO regulates, or about decisions to use or not use any of our regulatory powers (eg monetary penalties, enforcement notices, information notices etc)?

Please answer YES

*If you answer **No** to this question, you may not need to complete a EqIA.*

If you answered no to both Q1 and Q2, it is best practice to rationalise why there are no negative impacts to each protected characteristic in the table below.

Impact on people with protected characteristics

Q3. For each of the protected characteristics, you should consider whether there are any **positive impacts** for people with each characteristic and set those out in the table below. If you think there are any **negative impacts**, set those out in the table below **and** explain how you will fully mitigate those impacts. It is best practice to include three mitigations per negative impact. Sign off can only be done with a minimum of two mitigations. If you think there is no impact, please explain why you think that is the case.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
Religion or belief	No	
Race, nationality or cultural background	No	
Disabled people	Yes	Our ICO website is accessible, as are the new tools added to the website to help customers self-serve. We will retain a helpline for customers with accessibility needs, (this will be an option on the main ICO helpline number 0303 123

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
		<p>1113) so they can continue to access telephony services.</p> <p>Hearing impaired customers will be able to access the helpline telephony service, as they do currently:</p> <p>If they contact us via the phone and are deaf or have a hearing or speech impairment, they can use the free BT service Relay UK. They can install the free app on your smartphone, tablet, or computer, which you can access on your app store. Then our advice line on 0303 123 1113, Mon - Fri, 9am-5pm.</p> <p>The Relay UK service itself is free. Customers only pay your normal charges for the calls.</p> <p>If they want to use their textphone to contact us, they can dial 18001 followed by 0330 123 1113. Alternatively, they can also contact us using our live chat.</p> <p>All of this information related to hearing impaired customers is on the ICO website already.</p>

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
Sexual orientation	No	
Sex (see note 1)	No	
Age	No	
Gender reassignment (see note 2)	No	
Marital status	No	
Pregnancy and maternity	No	
Political opinions	No	
People with dependants	No	
People without dependants	No	
Socio-economic groups or social classes (see note 3)	No	
Multiple protected characteristics (see note 4)	No	

Note 1: you may also wish to consider gender while considering sex, although gender is not a protected characteristic under the Equality Act or s75 of the Northern Ireland Act 1998.

Note 2: you may wish to consider the impact on transgender people while considering the protected characteristic of gender reassignment. This includes if the person is proposing to undergo, is undergoing or has undergone a process.

Note 3: Socio-economic group or social class is not a protected characteristic, but we would still like to ensure that we consider the impact of our work in this area.

Note 4: Multiple protected characteristics is an opportunity to consider whether there are issues which affect people with most or all of the protected characteristics, or where there may be different impacts of the same issue on different characteristics (eg the same issue has a positive impact on people with one protected characteristic but a negative impact on people with another protected characteristic).

Q4. The ICO has a number of legal obligations in relation to the provision of Welsh language services. Is this work being delivered in Wales, or to the people of Wales, and if so will there be a need to consider the impact on the Welsh language?

Please answer Yes, No or Don't Know

*If you answer **Yes or Don't Know** to this question or would like further information, please contact the Welsh Regional office to discuss next steps via wales@ico.org.uk .*

@

Q5. In interests of best practice, you should consider whether this work may have a negative impact on or contravene any Human Rights. Click this link to find an overview of each of the human rights and further details about each. The Human Rights Act itself is available at this link. Please confirm that you have considered this and set out any actions you will take to mitigate any impacts.

Answer: On the ICO website we already advertise our Welsh language service. The telephone number for this is 0330 414 6421 to talk to the team. There is also the facility to contact the team in our Wales Office Email: wales@ico.org.uk

This project, will not impact on the Welsh language enquiry line.

What about the new self serve tools Faye? Will there be the option of using this in Welsh?

Contributing towards the ICO's equality objectives

Q6. How does this work contribute towards the ICO's equality objectives? Please explain contributions, state ways contribution could be increased, or state 'no contribution'.

Objective	Contribution to objective
<p>Objective 1: We will represent the communities and societies we serve</p> <p>We believe that diverse teams make better decisions, boost creativity and innovation, enable greater professional growth and increase our understanding of the communities we regulate. As a workforce, we are the most effective and have the greatest impact when we are representative and consider different perspectives.</p>	<p>N/A for this change.</p>
<p>Objective 2: Our culture will be inclusive</p> <p>We're at our best when we support and look out for one another, and when we trust and empower each other to be ourselves. That applies whether it's within the workplace or in the work that we do.</p> <p>We have measures in place to support our diverse workforce, such as reasonable adjustments. However, we will do more to remove the barriers that are preventing people from developing and progressing.</p>	<p>In line with the Workforce Strategy, we need to ensure we have the right people, with the right skills, in the right place, at the right time.</p> <p>Across the later part of 2024, we need staff within Business Services to have the capacity to focus on a project to increase fee revenue, both through acquisition work and also the Notice of Intent project, where we are contacting 50,000 organisations who have previously paid the ICO registration fee, but are not currently paying the annual fee. To ensure we have the capacity and capability to deal with this fee work, we will adopt a digital first approach to supporting business customers who come to the ICO with an enquiry.</p> <p>We know through the ICS Business Benchmarking survey (2023) that ICO customers score the ICO website highly for content and usability. Therefore we want to reposition our service offering to our</p>

Objective	Contribution to objective
	customers, so that Business Advice customer journey's start online, via self-serve. If a customer cannot find what they need online, there will be the option of live chat, email and outbound calls.
<p>Objective 3: We will better understand the needs of everyone to deliver services that are accessible to all</p> <p>We target our regulatory interventions on the areas of greatest harm and to make a real difference to people's lives. Technological innovation by businesses means the landscape we regulate is constantly transforming. We know we're at our best when we understand the needs of all our customers, including those who experience vulnerability and communities of unmet need.</p>	<p>As part of this pilot, we will be ensuring that there are feedback mechanisms in place for staff and customers. This includes ensuring that any entry point to the ICO has mechanisms to collect feedback from customers if they decide they don't want to self-serve, or cannot find the help they need on-line. This feedback will be used to improve the services available both in an iterative way (during the pilot) and reflectively at the end of the pilot phase.</p> <p>We have contingency plans in place, if we need to revert to providing more telephony services and will assess the need for this weekly, as the pilot gets underway.</p>

Monitoring and evaluation

Q7. What arrangements are in place, or will be put in place, to monitor and evaluate the impact of the work on equality?

Answer: We are embedding feedback and insight gathering mechanisms as each ICO entry point. This includes the other telephony lines we operate, including the Welsh language line, and the media lines. We will ensure that all staff have access to a 'lines to take' document and proactively seek feedback from customers who chose to use an alternative path into the ICO rather than the digital first, self-serve approach we plan to pilot.

Q8. How long will these arrangements be in place?

Answer: From 11 October for 3 months. These arrangements will then be reviewed to determine the success of the pilot and whether there is scope to roll this approach out on a more permanent basis, and potentially across other service areas.

Q9. When do you intend to review this EqIA? This should usually be done upon any change that is made to the original piece of work that this EqIA is for.

Answer: We will keep the EqiA document up to date. If we bring in any incremental changes during the pilot, we will update this form.

Publication

Q10. As stated above and in the guidance, we intend to publish all completed EqIAs on the ICO's website. Please provide detail of any necessary redactions and the intended publication date.

You should also review the wording to ensure that it is as clear as possible for any staff or public to read.

Answer: This form can be published with no redaction.

Governance and sign-off

The person who completes this document must be content that all potential equality issues have been identified and considered, that appropriate monitoring will be in place and the publication issues have been considered.

Please tick here to confirm that you have consulted with other colleagues and those it would largely impact where appropriate.

Please state here who has completed the EqIA:

Signed by: Suzanne Gordon
Date: 2 October 2024

Approved by line manager:

Signed by:
Date:

You **must** send your completed form to corporategovernance@ico.org.uk for storage and publication.

The EDI Board provides overall assurance that the EqIA process is operating effectively, but it is not for them to review or approve EqIAs.

If you have identified any negative impacts to any protected characteristics that you cannot fully mitigate, please contact Inclusion and Wellbeing for advice via inclusionandwellbeingteam@ico.org.uk.

Section 75 The Northern Ireland Act

To meet the NI section 75 consultation requirement, we must incorporate the following into our EqIA process. Please read through the below and implement as appropriate whilst completing your EqIA

1. We will externally publish a list of all EqIA screenings we complete. We should publish these quarterly. The spreadsheet will be 'housed' on the ICO website [Equality and diversity | ICO](#) (these will include **all** EqIA screenings we complete)
2. Where an EqIA screen results in the need for a full EqIA on a policy, procedure or change that relates directly to the ICO carrying out its external statutory functions; we will consult with key stakeholders at the earliest opportunity for 12 weeks. By law we must consult with the Northern Ireland stakeholder list, but good practice would be to include other relevant stakeholders from across the UK. The author/approval manager will be best placed to determine who these should be.

3. We have clarified that if we don't receive a response from these stakeholders to a consultation, that is fine. We record no response and move on with the policy, procedure or change.
4. We have clarified that we do not need to consult under s75 for policies that only impact our staff. Whilst its good practice to consult with staff, TU etc about changes that impact employees, ways of working etc, this type of internal change would not engage s75. We should of course complete an EqIA at the earliest opportunity, it's just that the s75 consultation requirement is unlikely to be engaged.
5. We have agreed that it would be for the manager who approves the EqIA to determine if a s75 consultation is needed. The Inclusion and Wellbeing team can provide support, but the author and manager will know their business area and will be best placed to assess if a new/change to a policy impacts external customer and stakeholders as part of our statutory function and should therefore be consulted on.
6. We have agreed that it should be for the author/approving manager to send the EqIA screening form or full EQIA form to corporate governance.

EqIA version control (to be updated by the person completing the EqIA)

Version number	
Status	
Relevant or related policies	Equality Impact Assessment Guidance
Author/owner	
Approved by	
Date of sign off	
Review date	

Version	Changes made	Date	Made by

Template version control (to be updated by the person updating the EqIA template)

Version number	2.4
Status	Not approved
Relevant or related policies	Equality Impact Assessment Guidance
Author/owner	EDI Board (EqIA sub group)
Approved by	Suzanne Gordon
Date of sign off	10 February 2023
Review date	February 2024

Version	Changes made	Date	Made by
0.1	Created new document.	June 2021	Chris Braithwaite
0.2	Amendment of title to EqIA and minor amendments	July 2021	Chris Braithwaite
0.2a	Amended to put protected characteristics and objectives into a table as an option to consider	July 2021	Chris Braithwaite
0.3	Added wording in relation to publishing the EqIA	August 2021	Chris Braithwaite
1.0	Links added and approved	September 2021	Chris Braithwaite
2.0	Reviewed form and process	8 August 2022	DOC, AT, JT, RS (IWT)
2.1	DOC added in sections and review of content	28 August	DOC
2.2	Amended changes after collaboration and feedback from the EDI Steering Group	30 August 2022	IWT
2.3	Updated to include best practice consideration of the Human Rights act	26 January 2023	Chris Braithwaite
2.4	Updated to include EDI objectives	6 September 2023	Roshini Mylvaganam

From: [Louise Locke](#)
To: [Rob Holtom](#)
Cc: [Paul Arnold](#)
Subject: the infamous wish lists from PADPCS, FOI and BS
Date: 11 January 2024 10:05:55
Attachments: [REDACTED]
Importance: High

Hi Rob

As requested, here are the wish lists from the team in the 'raw' format.

I have asked them to review and apply impact of change ie FTE and measure, which should be with me in the next week or so.

FOI is in the below email

In the meantime, the team have held the DDAT roadmap review and there are some takeaways, with a view to regrouping towards the end of Jan.

It does look, on the first swing by, that there is some current roadmap capacity that can be utilised for development initiatives.



Louise Locke

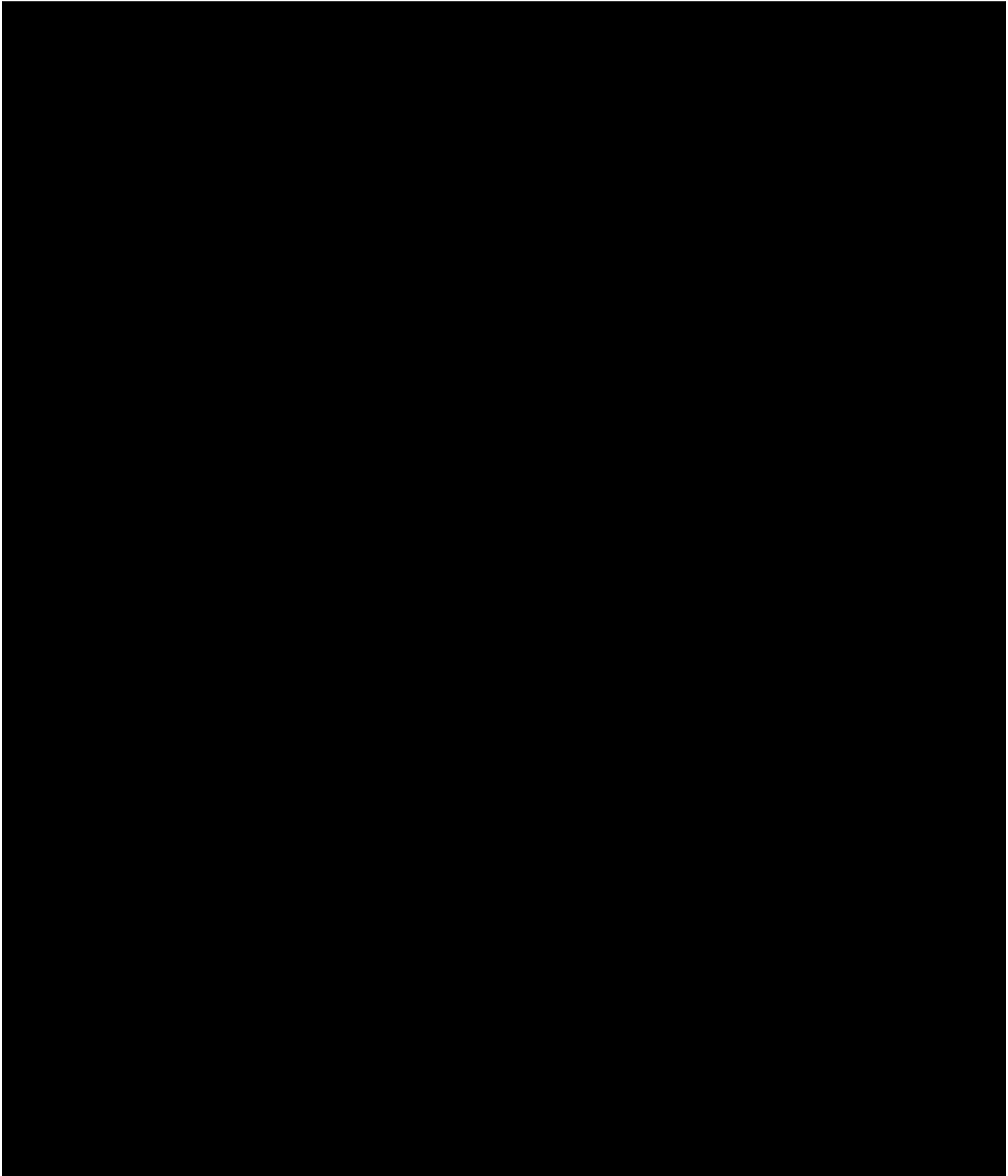
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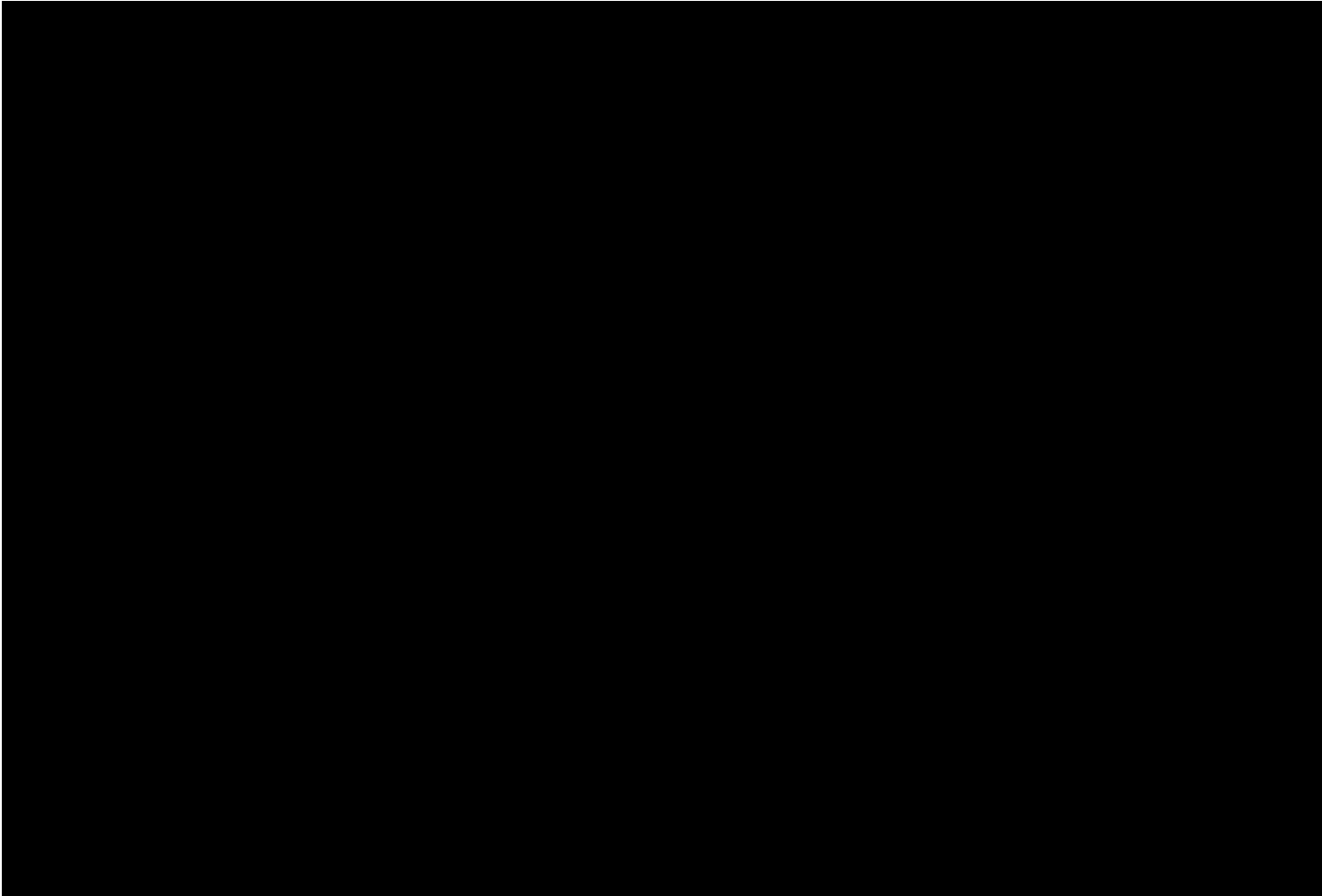
Technology wish list
Business Services





3. Implement an online members area

This wish is more ambitious. The ICO should introduce an online members area. There would be multiple benefits to this including:

- Increased self-service – There are activities we carry out for customers that they could do themselves, including making changes to their registration details and providing them with updates about cases. With a members area, customers could log in and carry out these activities for themselves, freeing up ICO staff time for more value added activities. This could also extend to organisations logging their assessment of their data breaches. Often they don't legally need to be reported, but organisations tell us about them 'just in case'. Allowing them to report their self-assessment here could negate the need for an unnecessary ICO response.
- 

From: [REDACTED]
To: [Angela Balakrishnan](#); [Tim Bowden](#); [REDACTED]; [REDACTED]; [Dave Murphy](#)
Cc: [Private Office Comms Public Affairs](#)
Subject: RE: External comms for business advice line and web changes
Date: 04 September 2024 13:28:44

Happy to be part of this too. I think there is a role for Brandwatch in terms of us monitoring the reaction in real time so that we can adapt/target messaging as needed throughout the process (of which I know absolutely nothing beyond this email!) and feed that back into the organisation.



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From: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>
Sent: Wednesday, September 4, 2024 8:14 AM
To: Tim Bowden <Tim.Bowden@ico.org.uk>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; Dave Murphy <Dave.Murphy@ico.org.uk>
Cc: Private Office Comms Public Affairs <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Subject: RE: External comms for business advice line and web changes

Thanks Tim. Given the need to deliver this (ie to manage the NOI work and re-engineer the user journey accordingly) and the fact there is going to be change, experimentation being advocated for. Ie – an understanding this will not be a perfect result, but we need to help plan to deliver something that can help achieve the goal and keep refining that plan as we go along.



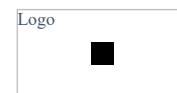
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Sent: Tuesday, September 3, 2024 5:06 PM
To: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; Dave Murphy <Dave.Murphy@ico.org.uk>
Cc: Private Office Comms Public Affairs <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Subject: RE: External comms for business advice line and web changes

Keen to be part of that discussion (Claire updated me on this on Friday). Completely agree about the value of raising awareness of these changes in advance, and framing them as part of a positive, forward-thinking plan to (further) improve services, and mitigate perception of something being taken away.

That will involve some expectation management – it's change, after all – but if we're clear in our own minds about how this plays out and to what timeframe, then we can be clear externally about the what, why and resulting benefits. While wrapping in all the great support we continue to offer, including new tools we've introduced to make things even easier.



Tim Bowden
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From: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>

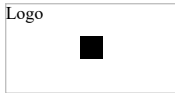
Sent: Tuesday, September 3, 2024 3:36 PM

To: [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; Dave Murphy <Dave.Murphy@ico.org.uk>

Cc: Tim Bowden <Tim.Bowden@ico.org.uk>; Private Office Comms Public Affairs <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>

Subject: RE: External comms for business advice line and web changes

Yes that is where clear comms messaging will be needed so businesses know what to expect and how we can support them. Look forward to the discussion.



Angela Balakrishnan

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From: [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>

Sent: Tuesday, September 3, 2024 3:33 PM

To: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; Dave Murphy <Dave.Murphy@ico.org.uk>

Cc: Tim Bowden <Tim.Bowden@ico.org.uk>; Private Office Comms Public Affairs <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>

Subject: RE: External comms for business advice line and web changes

Thanks for the update, Ange. I would definitely find it useful to discuss. I am still concerned about the October timeframe and how we lay the groundwork for the changes. Even if a callback option is available, if you're a business trying to call us it will look like the business advice line has simply been switched off, and at a time when DSIT is proposing to increase the DP fee so that we can continue to provide high quality business support. We need to understand how this is going to work in practice so that we can prepare.

[REDACTED]



[REDACTED]
Communications Business Partner

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From: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>

Sent: Tuesday, September 3, 2024 1:29 PM

To: [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; Dave Murphy <Dave.Murphy@ico.org.uk>

Cc: Tim Bowden <Tim.Bowden@ico.org.uk>; Private Office Comms Public Affairs <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>

Subject: RE: External comms for business advice line and web changes

Hi [REDACTED], copy to Marianne and Anna and cc to Tim

Filling you in on a convo with Rob and Louise yesterday and next steps – which I also think will be useful to discuss if helpful? Copying my private office to find a 15-20 min slot if so.

Louise is going to update the brainstorm paper that her teams have been working on to clearly set the context and objectives for this work.

There are two goals for this work and they are around efficiencies and resourcing – in line with other fee work ahead.

Firstly – to promote more self service via the website and use of live chat which is less resource intensive than the phonenumber. The phone isn't switched off completely, it's more a last resort, request a callback

which allows us to allocate resources more efficiently to it.

Secondly to ensure there are resources to deal with Qs that are likely to come on the back of the NOI work re the fee ahead – so we need to free up some of the phonline people.

The timescale of Oct still remains (the paper from Louise will set this out in more detail), we are taking an experimentation approach to how we migrate people towards self service and live chat – and this needs to be twinned with mitigating as much as we can some of the foreseen risks.

The paper will set out the associated tasks / ideas to help achieve the above goals. I think the ideas you have set out below Claire, plus others will feed into this. We'll need to think about how we prioritise all the potential action and activity – since we can't turn it all on at once.

Happy to chat more about some of my thoughts on this and hear yours about how we take it forward. Louise is ensuring this piece of work is properly part of the Customer Experience programme so there is proper project management and delivery around this.

We probably need to bring in someone from digital too – I recommend [REDACTED] as a first port of call since this will cut across our social media and website work.

[@Dave Murphy](#) copying you in for awareness.

Ange



Angela Balakrishnan

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From: [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Sent: Wednesday, August 28, 2024 2:52 PM
To: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>
Subject: External comms for business advice line and web changes

Hi Ange,

Hope you had a good break.

I understand that conversations are ongoing about comms resource to support website development as we move towards decreasing reliance on the business advice line. I wanted to share some thoughts which I hope might help you in those conversations.

Faye has said that the ask of comms is purely web support, with nothing external required. I've been thinking about it, and I disagree that there isn't another role for us to play here. Reputation management and being ready with LTTs should the business advice line close (even temporarily) in October aside, it feels like there is an opportunity for a business support campaign to promote the various resources that we already have, and incorporating the new web developments when they are ready.

We know that, apart from the DP fee, the main reason for calls is advice on marketing/PECR, SARs and PDB. We're working on a direct marketing tool, which should be ready at the end of September/start of October, that will help to address PECR. We're currently considering how we promote it, but instead of a campaign dedicated to this tool we could bring it into a wider business support piece pushing our other online resources, along with whatever solutions are put in place for PDB and SARs.

I'd appreciate your thoughts based on what you know Louise and Rob are planning, and their appetite for being proactive in this area. I don't want to push the idea if there is no desire to be proactive but I also don't want us to do nothing when we could be adding value during a significant change in our approach to business support.

[REDACTED]



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From: [Faye Spencer](#)
To: [REDACTED]
Subject: FW: High level approach for Business Advice channel shift
Date: 05 September 2024 16:03:30
Attachments: [High level plan for Business Advice Channel Shift v0.1 05Sep2024.docx](#)

Here's the doc we need to flesh out tomorrow.

Faye

From: Louise Locke <Louise.Locke@ico.org.uk>
Sent: Thursday, September 5, 2024 2:39 PM
To: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>; Rob Holtom <Rob.Holtom@ico.org.uk>
Cc: Faye Spencer <Faye.Spencer@ico.org.uk>; Suzanne Gordon <Suzanne.Gordon@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Subject: High level approach for Business Advice channel shift

Hi there

After meeting with Faye and Suzanne, and as discussed earlier this week, please find attached the high-level plan of approach for the self-service on Business Advice.

Both Faye and Suzanne as program sponsors, are invested in the steps outlined in the plan and are moving forwards, within the governance framework, to deliver on the detailed steps underpinning this overview.

This was briefly outlined in the board meeting earlier today.

Please do let me know if you have any other questions at this stage and progress on this initiative will be managed via Laura within the programme structure.

Thanks
Louise



Louise Locke

Executive Director of Customer Services
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Wilmslow, Cheshire SK9 5AF
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High Level plan for Channel shifting Business Advice Customers to self-serve.

Faye Spencer, Project Lead, [REDACTED] Project Manager

From 1 October, we will be channel shifting our Business Advice customers who contact us via the helpline with an enquiry onto the ICO website, so that they start their enquiry journey via self-serve.

We will be running this as an agile test and learn pilot for up to three months, and we will use feedback from our customers throughout the pilot, to improve the experience by taking an iterative approach.

For the pilot we will remove the inbound Business and PDB advice lines, and update the IVR script, so it signposts customers to the ICO website. Customers will still be supported by a small number of ICO case officers who will be active on live chat. If a customer has a particularly technical enquiry, the Live chat agent will ask the customer for their telephone number and make an outbound call to resolve their enquiry.

Allowing for accessibility needs we will direct customer on the IVR accordingly.

To ensure we are ready for 'go live' we will need to develop a detailed plan to cover the following activities:

1. **Develop improved customer journeys on our website.** This will include the development of tools to help customers identify the guidance they need. The tools will ask the customer a series of questions to help guide the customer in the right direction and help them navigate through our guidance library. We will start this with the SAR guidance and will have this ready for October. Adding further topics to the tool in iterative stages post 'go live'. The tool will have a feedback mechanism, so that we can collate and use user feedback to help inform future iterations.
2. **Ensure that the 'Contact Us' page is updated to drive self-serve.**
3. **Update our IVR for October, directing all Business Advice callers to the ICO website.**
4. **Ensure we have an internal comms plan, which includes updating our staff and TU.**
5. **Ensure we conduct an EQIA review to ensure customers with reasonable adjustment needs can access our services.**
6. **Ensure we have an external comms plan** to support 'go live', messaging to our customers that we are starting our services online. The messaging needs to promote our all of the guidance, tools and help available online.
7. **Ensure we map out all entry points across the ICO** incase we see Business callers telephoning random lines. To ensure we capture data on the number of calls and why the customer didn't get the help they needed on the website, we will need to develop a script for call agents to have ready so that we capture customer feedback.
8. **Ensure mobile device compatibility.**
9. **Develop a contingency plan (option 2), which we have ready to deploy, if needed.**
This would include continuing to promote our self-service route but turning the inbound line back on with a small team of call handlers. We would deploy this if we saw unwieldy numbers of rogue calls going to other ICO lines, and/or the feedback we get through the new online tools indicates that we aren't meeting our customer's needs.

From: [REDACTED]
To: [REDACTED]
Subject: RE: External comms for business advice line and web changes
Date: 06 September 2024 16:16:00
Attachments: [REDACTED]

Thanks, [REDACTED]. Timing is the big question here. The meeting with Ange to discuss external comms for the business advice line and web services isn't until 9 October. I'm on leave from 17 September until 8 October so suspect that's why it's not until then (plus diaries being a bit of a nightmare). It makes me a bit nervous as I keep being told that the line will be shut down/reduced in October and this doesn't give us much time to get anything in place to help drive people to the website instead. I'm going to pick it up with Tim again next week but happy to chat before I go on leave if that would help.

Just FYI, attached is the data supplied by BAS about the key questions they receive about PDB and SARs. These, along with PECR, have been identified as the topics that generate most of the calls to the helpline. I don't have that data but can ask for it if it would be useful.

[REDACTED]



[REDACTED]
Communications Business Partner

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From: [REDACTED]@ico.org.uk>
Sent: Thursday, September 5, 2024 5:05 PM
To: [REDACTED]@ico.org.uk>; [REDACTED]@ico.org.uk>
Subject: RE: External comms for business advice line and web changes

Hello,

Anna and I have caught up on this and think there are a few things we could potentially offer (see below) BUT the challenge is going to be resource and timing. We don't have much capacity until after 20 September and even then things look busy.

What are the specific timings on this project? Perhaps we can have a chat and see how we can narrow down the scope to give you some insight without overcommitting? For example, the first two from the list below are very time-consuming and I'm not sure they'll give you as much bang for your buck as the last two. Let me know when would be good to chat.

Thanks,

[REDACTED]

Behaviour change – Review existing research available to understand how to switch consumer behaviour and what the reputational considerations may be (I did a very quick Google as I wrote this email and there are lots of studies and opinion pieces out there that we could review and summarise key outtakes from).

Case studies – Look to see if we can find examples of organisations (like EasyJet) that have done this and review to see what we can learn from them.

Risk management – Gather data from the BAS service on the topics that they are most-often called about so that we can try to ensure these are well-addressed on the website, live chat and social during the switch.

Reputation tracking – Provide daily update reports during the first week of the switch, moving to weekly for the rest of the first month. We can largely automate this via Brandwatch (assuming it is in place).



[Redacted]

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From: [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>
Sent: Wednesday, September 4, 2024 3:39 PM
To: [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>; [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>
Subject: RE: External comms for business advice line and web changes

Hi both,

Just following on from this email, I don't want to get too ahead of this conversation, but I can see the direction of travel and we're going to need research/insight into what drives people to switch from phone support to web (apart from simply taking the phone number away so they have no choice, as per easyJet, for example). Any thoughts on how we help shift this behaviour much appreciated.

Also just FYI, we'd started comms planning for launch of a new direct marketing tool for businesses, but as we know PECR is one of the top reasons for calls alongside SARs and PDB, we're now thinking we bring this into a wider campaign promoting our web support and as part of this wider customer experience work. Business Services has provided some data on the main reasons for phone calls and which sectors they come from, but I don't think we ask or record why people called instead of using the website.

[Redacted]



[Redacted]

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From: [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>
Sent: Wednesday, September 4, 2024 1:29 PM
To: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>; [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>; [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>; Dave Murphy <Dave.Murphy@ico.org.uk>
Cc: Private Office Comms Public Affairs <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>
Subject: RE: External comms for business advice line and web changes

Happy to be part of this too. I think there is a role for Brandwatch in terms of us monitoring the reaction in real time so that we can adapt/target messaging as needed throughout the process (of which I know absolutely nothing beyond this email!) and feed that back into the organisation.



[Redacted]

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From: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>
Sent: Wednesday, September 4, 2024 8:14 AM
To: Tim Bowden <Tim.Bowden@ico.org.uk>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; Dave Murphy <Dave.Murphy@ico.org.uk>
Cc: Private Office Comms Public Affairs <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Subject: RE: External comms for business advice line and web changes

Thanks Tim. Given the need to deliver this (ie to manage the NOI work and re-engineer the user journey accordingly) and the fact there is going to be change, experimentation being advocated for. Ie – an understanding this will not be a perfect result, but we need to help plan to deliver something that can help achieve the goal and keep refining that plan as we go along.



Angela Balakrishnan

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From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Tuesday, September 3, 2024 5:06 PM
To: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; Dave Murphy <Dave.Murphy@ico.org.uk>
Cc: Private Office Comms Public Affairs <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Subject: RE: External comms for business advice line and web changes

Keen to be part of that discussion (Claire updated me on this on Friday). Completely agree about the value of raising awareness of these changes in advance, and framing them as part of a positive, forward-thinking plan to (further) improve services, and mitigate perception of something being taken away.

That will involve some expectation management – it's change, after all – but if we're clear in our own minds about how this plays out and to what timeframe, then we can be clear externally about the what, why and resulting benefits. While wrapping in all the great support we continue to offer, including new tools we've introduced to make things even easier.



Tim Bowden
Head of Strategic Communications

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From: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>
Sent: Tuesday, September 3, 2024 3:36 PM
To: [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; Dave Murphy <Dave.Murphy@ico.org.uk>
Cc: Tim Bowden <Tim.Bowden@ico.org.uk>; Private Office Comms Public Affairs <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Subject: RE: External comms for business advice line and web changes

Yes that is where clear comms messaging will be needed so businesses know what to expect and how we can support them. Look forward to the discussion.



Angela Balakrishnan

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From: [REDACTED] <[REDACTED]@ico.org.uk>

Sent: Tuesday, September 3, 2024 3:33 PM

To: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; Dave Murphy <Dave.Murphy@ico.org.uk>

Cc: Tim Bowden <Tim.Bowden@ico.org.uk>; Private Office Comms Public Affairs <[REDACTED]@ico.org.uk>

Subject: RE: External comms for business advice line and web changes

Thanks for the update, Ange. I would definitely find it useful to discuss. I am still concerned about the October timeframe and how we lay the groundwork for the changes. Even if a callback option is available, if you're a business trying to call us it will look like the business advice line has simply been switched off, and at a time when DSIT is proposing to increase the DP fee so that we can continue to provide high quality business support. We need to understand how this is going to work in practice so that we can prepare.

[REDACTED]

Logo



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Communications Business Partner

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Sent: Tuesday, September 3, 2024 1:29 PM

To: [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; Dave Murphy <Dave.Murphy@ico.org.uk>

Cc: Tim Bowden <Tim.Bowden@ico.org.uk>; Private Office Comms Public Affairs <[REDACTED]@ico.org.uk>

Subject: RE: External comms for business advice line and web changes

Hi [REDACTED], copy to Marianne and Anna and cc to Tim

Filling you in on a convo with Rob and Louise yesterday and next steps – which I also think will be useful to discuss if helpful? Copying my private office to find a 15-20 min slot if so.

Louise is going to update the brainstorm paper that her teams have been working on to clearly set the context and objectives for this work.

There are two goals for this work and they are around efficiencies and resourcing – in line with other fee work ahead.

Firstly – to promote more self service via the website and use of live chat which is less resource intensive than the phonenumber. The phone isn't switched off completely, it's more a last resort, request a callback which allows us to allocate resources more efficiently to it.

Secondly to ensure there are resources to deal with Qs that are likely to come on the back of the NOI work re the fee ahead – so we need to free up some of the phonenumber people.

The timescale of Oct still remains (the paper from Louise will set this out in more detail), we are taking an experimentation approach to how we migrate people towards self service and live chat – and this needs to be twinned with mitigating as much as we can some of the foreseen risks.

The paper will set out the associated tasks / ideas to help achieve the above goals. I think the ideas you have set out below Claire, plus others will feed into this. We'll need to think about how we prioritise all the potential action and activity – since we can't turn it all on at once.

Happy to chat more about some of my thoughts on this and hear yours about how we take it forward. Louise is ensuring this piece of work is properly part of the Customer Experience programme so there is proper project management and delivery around this.

We probably need to bring in someone from digital too – I recommend [REDACTED] as a first port of call since this will cut across our social media and website work.

@Dave Murphy copying you in for awareness.

Ange



Angela Balakrishnan

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From: [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Sent: Wednesday, August 28, 2024 2:52 PM
To: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>
Subject: External comms for business advice line and web changes

Hi Ange,

Hope you had a good break.

I understand that conversations are ongoing about comms resource to support website development as we move towards decreasing reliance on the business advice line. I wanted to share some thoughts which I hope might help you in those conversations.

Faye has said that the ask of comms is purely web support, with nothing external required. I've been thinking about it, and I disagree that there isn't another role for us to play here. Reputation management and being ready with LTTs should the business advice line close (even temporarily) in October aside, it feels like there is an opportunity for a business support campaign to promote the various resources that we already have, and incorporating the new web developments when they are ready.

We know that, apart from the DP fee, the main reason for calls is advice on marketing/PECR, SARs and PDB. We're working on a direct marketing tool, which should be ready at the end of September/start of October, that will help to address PECR. We're currently considering how we promote it, but instead of a campaign dedicated to this tool we could bring it into a wider business support piece pushing our other online resources, along with whatever solutions are put in place for PDB and SARs.

I'd appreciate your thoughts based on what you know Louise and Rob are planning, and their appetite for being proactive in this area. I don't want to push the idea if there is no desire to be proactive but I also don't want us to do nothing when we could be adding value during a significant change in our approach to business support.

[REDACTED]



[REDACTED]
Communications Business Partner

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From: [REDACTED]
To: [REDACTED]
Subject: Heads up - business advice channel shift
Date: 11 September 2024 10:27:00
Attachments: [High level plan for Business Advice Channel Shift v0.1 05Sep2024.docx](#)

Morning,

I just wanted to give you a heads up about something that will be coming your way as I don't think anyone has engaged with your team yet.

Business advice services is looking to shift people from calling the helpline to self-serving on the website. This essentially means that option 2 on the helpline (for people calling for advice on behalf of their organisation) will be removed and callers will be told to go to the website instead. Additional staff will be put on the live chat, and BAS is working with DDaT to improve some of the existing tools around SARs, plus we have the new privacy notice generator and a new direct marketing click thinking tool to help address some of the main areas that people call about.

The attached plan explains a bit more, but it is still very much in development even though the target date for the change is 1 October. Important to note that **staff have not yet been told** about these changes (I think Suzanne Gordon is leading on the trade union conversations) so this is not for onward sharing at this point. It's obviously going to need internal comms to support this new approach so I wanted to loop you in sooner rather than later.

I'm working up an external comms plan to set out the risks and propose our approach, so can share this with you when it's in better shape if that would be helpful. I'm on leave from next Tuesday (17 Sep) until 8 October so I'll be leaving this with Tim to coordinate in my absence.

Faye Spencer is the lead with support from Suzanne Gordon, and [REDACTED] is Project Manager. Faye has asked for everything to channel through [REDACTED] at this stage.

[REDACTED]



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From: [REDACTED]
To: [Tim Bowden](#); [Angela Balakrishnan](#); [REDACTED]
Cc: [Private Office Comms Public Affairs](#)
Subject: RE: MEETING NEEDED ASAP (for my PO) RE: High level approach for Business Advice channel shift
Date: 11 September 2024 16:38:52
Attachments: [High level plan for Business Advice Channel Shift v0.1_05Sep2024.docx](#)
[image002.png](#)

High level plan attached. This was shared with me yesterday and formed the basis of the discussion we had yesterday afternoon, Tim, so hopefully no surprises in there.

I've pulled a document together that starts setting out what's happening, flags the risks and suggests what a proactive or reactive approach may look like: [Business advice channel shift.docx](#)

It still needs quite a bit of work, but I wanted to get this underway before I went on holiday.

[REDACTED]



[REDACTED]
Communications Business Partner
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From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Wednesday, September 11, 2024 4:05 PM
To: [Angela Balakrishnan](#) <Angela.Balakrishnan@ico.org.uk>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Cc: Private Office Comms Public Affairs <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Subject: RE: MEETING NEEDED ASAP (for my PO) RE: High level approach for Business Advice channel shift

...although the attachment I'm seeing is our previous email conv, not the high-level plan?



Tim Bowden
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From: Tim Bowden
Sent: Wednesday, September 11, 2024 3:54 PM
To: [Angela Balakrishnan](#) <angela.balakrishnan@ico.org.uk>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Cc: Private Office Comms Public Affairs <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Subject: RE: MEETING NEEDED ASAP (for my PO) RE: High level approach for Business Advice channel shift

Not opened the attachment yet – just to say, we have a meeting for all of us in for 2pm tomorrow, so this is well timed [REDACTED] I will forward invite to you)



Tim Bowden
Head of Strategic Communications
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 313 1638 [ico.org.uk](#) [twitter.com/iconews](#)
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From: [Angela Balakrishnan](#) <Angela.Balakrishnan@ico.org.uk>

Sent: Wednesday, September 11, 2024 3:44 PM

To: [redacted] <[redacted]@ico.org.uk>; [redacted] <[redacted]@ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>; [redacted] <[redacted]@ico.org.uk>; [redacted] <[redacted]@ico.org.uk>

Cc: Private Office Comms Public Affairs [redacted] <[redacted]@ico.org.uk>

Subject: MEETING NEEDED ASAP (for my PO) RE: High level approach for Business Advice channel shift

Hi all

Louise and her team have shared the high-level plan for shifting the focus on the Business Advice helpline – see attached. This outlines the context and reasoning behind it and some of the ideas the team have come up with, partly in consultation with other teams – on the things we need to do to achieve the goal.

This needs our further input to shape and work out how we prioritise the different actions to meet the timeline (yep it's tight – I'll see if there is any leeway into Oct re this).

Claire – I know we've had a slew of meetings lately and you're about to go on leave, shall we try and meet tomorrow? Or next week? Copying in my private office to find us a time so we can work out what we need to do at minimum now, before we continue to refine this work. And also how we balance resourcing.

Don't worry – we'll get there together!

Thank you

Ange



Angela Balakrishnan

Executive Director of Strategic Communications and Public Affairs
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From: Louise Locke <Louise.Locke@ico.org.uk>

Sent: Thursday, September 5, 2024 2:39 PM

To: Angela Balakrishnan <Angela.Balakrishnan@ico.org.uk>; Rob Holtom <Rob.Holtom@ico.org.uk>

Cc: Faye Spencer <Faye.Spencer@ico.org.uk>; Suzanne Gordon <Suzanne.Gordon@ico.org.uk>; [redacted] <[redacted]@ico.org.uk>

Subject: High level approach for Business Advice channel shift

Hi there

After meeting with Faye and Suzanne, and as discussed earlier this week, please find attached the high-level plan of approach for the self-service on Business Advice.

Both Faye and Suzanne as program sponsors, are invested in the steps outlined in the plan and are moving forwards, within the governance framework, to deliver on the detailed steps underpinning this overview.

This was briefly outlined in the board meeting earlier today.

Please do let me know if you have any other questions at this stage and progress on this initiative will be managed via Laura within the programme structure.

Thanks
Louise



Louise Locke

Executive Director of Customer Services
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High Level plan for Channel shifting Business Advice Customers to self-serve.

Faye Spencer, Project Lead, [REDACTED] Project Manager

From 1 October, we will be channel shifting our Business Advice customers who contact us via the helpline with an enquiry onto the ICO website, so that they start their enquiry journey via self-serve.

We will be running this as an agile test and learn pilot for up to three months, and we will use feedback from our customers throughout the pilot, to improve the experience by taking an iterative approach.

For the pilot we will remove the inbound Business and PDB advice lines, and update the IVR script, so it signposts customers to the ICO website. Customers will still be supported by a small number of ICO case officers who will be active on live chat. If a customer has a particularly technical enquiry, the Live chat agent will ask the customer for their telephone number and make an outbound call to resolve their enquiry.

Allowing for accessibility needs we will direct customer on the IVR accordingly.

To ensure we are ready for 'go live' we will need to develop a detailed plan to cover the following activities:

1. **Develop improved customer journeys on our website.** This will include the development of tools to help customers identify the guidance they need. The tools will ask the customer a series of questions to help guide the customer in the right direction and help them navigate through our guidance library. We will start this with the SAR guidance and will have this ready for October. Adding further topics to the tool in iterative stages post 'go live'. The tool will have a feedback mechanism, so that we can collate and use user feedback to help inform future iterations.
2. **Ensure that the 'Contact Us' page is updated to drive self-serve.**
3. **Update our IVR for October, directing all Business Advice callers to the ICO website.**
4. **Ensure we have an internal comms plan, which includes updating our staff and TU.**
5. **Ensure we conduct an EQIA review to ensure customers with reasonable adjustment needs can access our services.**
6. **Ensure we have an external comms plan** to support 'go live', messaging to our customers that we are starting our services online. The messaging needs to promote our all of the guidance, tools and help available online.
7. **Ensure we map out all entry points across the ICO** incase we see Business callers telephoning random lines. To ensure we capture data on the number of calls and why the customer didn't get the help they needed on the website, we will need to develop a script for call agents to have ready so that we capture customer feedback.
8. **Ensure mobile device compatibility.**
9. **Develop a contingency plan (option 2), which we have ready to deploy, if needed.**
This would include continuing to promote our self-service route but turning the inbound line back on with a small team of call handlers. We would deploy this if we saw unwieldy numbers of rogue calls going to other ICO lines, and/or the feedback we get through the new online tools indicates that we aren't meeting our customer's needs.

From: [REDACTED]
To: [Tim Bowden](#); [REDACTED]; [REDACTED]
Cc: [REDACTED]; [Dave Murphy](#); [REDACTED]
Subject: Handover - business advice channel shift
Date: 16 September 2024 11:49:37
Attachments: [image001.png](#)

Hi all,

I'm on leave from tomorrow until 8 October so here's a more detailed update on where we're at with planning for the changes to business advice services (CBPs and [REDACTED] – for info while I'm away, no action needed from you).

As it stands, the helpline option to speak to business advice services (BAS) will be removed on 1 October. This date is still TBC, but we need to assume it is happening until told otherwise. We're suggesting a proactive approach to share what we're planning and why, so the priority at this stage is to get our key messages, FAQs and methods of delivery pinned down. How proactive we are with stakeholders is a key question that needs urgent consideration by BAS.

Once this is in place we need to start planning for a longer-term campaign that tells the story of our offer to businesses and showcases the new and improved resources on our website (eg improvements to SARs pages, new direct marking tool, PNG). This can happen in phases, but we will need something in place relatively quickly to tide us over while we look at the best approach to drive this behaviour change from phone to web support.

I've tried to bring together all the information we have so far into a comms plan: [\[REDACTED\] Comms Plan Business advice channel shift.docx](#). I think the strategic thinking is in a good place for phase one, but we don't yet have the products or the delivery plan, so that's the priority in the coming days.

I've also started a list of FAQs that are likely to come up [\[REDACTED\] Business advice line FAQs.docx](#) which should help to inform any media lines. These are based on the info we have so far and our recommended approach to the messaging but will need to be signed off by Faye Spencer and Louise Locke.

I've sent a new work email this morning following conversations with Alice and Kate, so everyone should be up to speed with the current status of things. Tim is going to cover this from the strategy side while I am away.

It's important to remember that **this is currently not for onward sharing** as BAS staff have not yet been told about the proposed changes and conversations with the union are ongoing. Mandy from internal comms now looped in and is speaking with Katy later this week about how this is communicated more widely but for now this cannot be added to F2V or snapshots.

██████████ is Project Manager. She is aware that we are developing a comms plan and has asked for a copy once we have a clearer idea of our delivery. I'd suggest channelling everything through her for sign off to avoid accidentally looping in anyone outside of the current core team.

I think that's everything. I'm around until 3.30pm today if you have any questions.

Thanks for looking after this while I'm away.

██████████



██████████

Communications Business Partner

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

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From: [REDACTED]
To: [Comms - Managers](#)
Cc: [REDACTED]
Subject: NEW WORK: Business advice channel shift
Date: 16 September 2024 11:41:10
Attachments: [image002.png](#)

Note: [REDACTED] was involved in an initial discussion on this campaign and Kate has agreed that she will be the assigned social lead (Lisa is aware).

NEW WORK: Business advice channel shift

Project aims:

Phase 1: Introduce changes to our approach to providing business advice and ensure a smooth transition

Phase 2: Tell the story of the ICO's support for business and showcase the range of online resources available supporting behaviour change from phone to web contact

Comms aims:

Phase 1:

- Ensure information about the transition is available on all our channels to maintain openness and transparency
- Deliver clear and consistent messaging that positions the ICO as being an enabler of business
- Gather actionable insight to inform future phases of activity (specifically on messaging and communication channels)

Background

From 1 October there will be changes to the way the ICO provides advice to business customers. These changes are necessary to redirect Business Advice Services (BAS) resource to where it is needed the most.

The option to speak to the business advice team will be removed from the helpline and callers directed to start their enquiry journey online. A small number of additional staff will be made available to support live chat and where an enquiry is complex a call back can be offered. People with accessibility needs will be directed by recorded message (awaiting the detail).

This approach will be tested for up to three months and feedback gathered to understand the customer experience and help improve it through iterative changes.

Phase one, and the **priority**, is to communicate the changes in advance

and provide reassurance that the ICO is still here to support businesses, it will just look a bit different. Phase two is to develop a long-term campaign that tells the story of how the ICO support businesses by showcasing the range of online resources available to use, quickly and easily, 24/7. DDaT is helping to improve website user journeys in the areas that the helpline receives the most calls – SARs and PDB – while tools to support direct marketing and privacy notices are either nearing completion or have already launched.

Further background information is in the comms plan: [Comms Plan_Business advice channel shift.docx](#).

I have also started a set of FAQs to help inform our LTT based on conversations so far but these will need to be added to and adapted with feedback from BAS: [Business advice line FAQs.docx](#)

Important note: the proposed changes have **not** yet been communicated to BAS staff. Conversations with trade unions are underway and nothing will happen until those discussions have concluded. If you need messaging signed off in the interim, please go through [REDACTED] project manager, who will make sure that the correct people are sighted. Internal Comms [REDACTED] is linked in and will be updated by Katy later this week.

Audiences for phase 1:

- Businesses already engaged with the ICO through our social channels and website

Timings: Advice line switch off scheduled for 1 October (TBC). A wider campaign to highlight pro-business support will be needed in some form from October but knowing that we need longer term planning and development to support behaviour change.

Dependencies: Internal staff conversations, agreement of proactive approach, agreement of comms plan and key messages.

Who will oversee the project's delivery: [REDACTED] but Tim Bowden and strategic team will support to cover annual leave from 17 September to 8 October.

What's needed:

- Assign delivery leads (press, social, design) – [REDACTED] has been involved in initial conversations and will continue to be the contact for social
- Delivery leads to feed into comms plan with plan for phase one approach (**urgent**)
- Press lead to develop lines to take for phase 1

Delivery leads to manage delivery of the comms plan with oversight from CBP

Is it in F2V: No – see important note above

Is it on the campaign tracker: No – see important note above

Is it on the guidance tracker: N/A

Delivery leads:

Social: Lisa

Design:

Press:

CBP: [REDACTED]

Logo



[REDACTED]
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From: [Faye Spencer](#)
To: [Suzanne Gordon](#); [Robert Johnson](#); [REDACTED]
Cc: [REDACTED]
Subject: BAS channel shift presentation - 202409.pptx
Date: 18 September 2024 22:31:22
Attachments: [BAS channel shift presentation - 202409.pptx](#)

Hi

Here's the slides I'll use for our discussion with the TUs on Friday.

This isn't intended to capture all the activities we're doing, just want to give the main points as a starter for a conversation. But if you have time to read them (and no worries if not) and you spot any glaring omissions, please let me know.

Thanks

Faye

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Business advice channel shift FAQ document
Date: 19 September 2024 12:55:19
Attachments: [image002.png](#)

Hi Katy,

Myself, Helen and Lucy have been asked to look at the business advice channel comms which I believe you are leading on.

There is a FAQ document which has been started, would you mind having a look at this and adding answers to the blank questions and checking the others are correct? [Business advice line FAQs.docx](#)

The FAQ doc is predominantly for the press team should we get asked questions from journalists.

Let me know if you need anything else from me.

Thanks,

[REDACTED]



[REDACTED]
Lead Communications Officer

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

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From: [Suzanne Gordon](#)
To: [Faye Spencer](#); [Robert Johnson](#); [REDACTED]
Cc: [REDACTED]
Subject: RE: BAS channel shift presentation - 202409.pptx
Date: 19 September 2024 12:43:34
Attachments: [BAS channel shift presentation - 202409_SG amends.pptx](#)

Hi Faye, thanks for sharing this. Its looks great.

I have suggested adding in another line (highlighted in yellow). I didn't on that slide include the IVR option for customers with accessibility needs, so I can see you are going to cover this off when talking to the risk mitigation slide.

Hope this helps.

Suzanne

From: Faye Spencer <Faye.Spencer@ico.org.uk>
Sent: Wednesday, September 18, 2024 10:30 PM
To: Suzanne Gordon <Suzanne.Gordon@ico.org.uk>; Robert Johnson <Robert.Johnson@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: BAS channel shift presentation - 202409.pptx

Hi

Here's the slides I'll use for our discussion with the TUs on Friday.

This isn't intended to capture all the activities we're doing, just want to give the main points as a starter for a conversation. But if you have time to read them (and no worries if not) and you spot any glaring omissions, please let me know.

Thanks

Faye

From: [Tim Bowden](#)
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: NEW WORK: Business advice channel shift
Date: 19 September 2024 13:06:00
Attachments: [image002.png](#)

Thanks Lucie, Alice

I've shared the comms plan as a work in progress with Katy because we need sign-off on our recommended approach (which is to be proactive) asap.

But I don't envisage a scenario where we won't need the FAQ doc and statement, either proactively or reactively, so if we can get cracking on those that would be helpful – thank you Lucie.

There are some draft KMs in the comms plan which are a good starter for a statement and developing the FAQs. Def support feeding these back through Katy for input from the project leads as we go, given the proposed timeframe.

And happy to recommend (and for us to do) a LinkedIn blog too if we feel that's a good route to our audience here.

Thanks all,

Tim



Tim Bowden
Head of Strategic Communications

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From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Thursday, September 19, 2024 12:51 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: RE: NEW WORK: Business advice channel shift

Hi all,

Kate and I just discussed this briefly with Dave and he suggested a LinkedIn blog would be a good approach for this?

The press team's role as I understand it is to pull together some FAQs as requested and Helen/Lucie have started with that, and I think those can be used as the basis for a statement once it's agreed who is doing that part.

Thanks,
Alice



[REDACTED]
News Manager

Please be aware I do not work on Wednesdays.

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From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Thursday, September 19, 2024 12:46 PM
To: Tim Bowden <Tim.Bowden@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Subject: RE: NEW WORK: Business advice channel shift

Hey Tim,

Helen spoke to me about this this morning so I am going to look through the FAQ doc this afternoon and send this to Katy for her to add some answers. In terms of a statement, Helen and I were unsure who was doing this but I am happy to draft something based on the below if needs be?

Thanks,

[REDACTED]



[REDACTED]

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From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Thursday, September 19, 2024 10:18 AM
To: [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Subject: FW: NEW WORK: Business advice channel shift

Morning [REDACTED]

Can I check firstly that people know what they are being asked to do on this project, and secondly whether it has been progressed this week? (I appreciate we've had other things on).

As far as I know this work is still confidential but I'll be looking to catch up with [REDACTED] today or tomorrow.

Thanks
Tim



Tim Bowden
Head of Strategic Communications

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From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Tuesday, September 17, 2024 11:29 AM
To: [REDACTED] <[REDACTED]@ico.org.uk>; Comms - Managers [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: RE: NEW WORK: Business advice channel shift

Hi all,

This is going to require a bit of a group effort from the press team as we have a fair amount coming up. [REDACTED] has agreed to have a first look at it this week (with support from [REDACTED]) to start the thinking on Q&A etc, then [REDACTED] will pick it up when she's back next week to free up Helen

and Lucie to concentrate on DPPC.

@Tim Bowden – worth noting that eagle-eyed Helen noticed that w/c 30 Sept is customer service week, so lots of internal comms planned on that on F2V, which may add an extra layer to proceedings.

Thanks,
Alice



News Manager

Please be aware I do not work on Wednesdays.

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From: [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Sent: Monday, September 16, 2024 11:41 AM
To: Comms - Managers <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Cc: [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Subject: NEW WORK: Business advice channel shift

Note: [REDACTED] was involved in an initial discussion on this campaign and Kate has agreed that she will be the assigned social lead (Lisa is aware).

NEW WORK: Business advice channel shift

Project aims:

Phase 1: Introduce changes to our approach to providing business advice and ensure a smooth transition
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I have also started a set of FAQs to help inform our LTT based on conversations so far but these will need to be added to and adapted with feedback from BAS: [Business advice line FAQs.docx](#)

Important note: the proposed changes have **not** yet been communicated to BAS staff. Conversations with trade unions are underway and nothing will happen until those discussions have concluded. If you need messaging signed off in the interim, please go through [redacted] project manager, who will make sure that the correct people are sighted. Internal Comms ([redacted]) is linked in and will be updated by Katy later this week.

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Timings: Advice line switch off scheduled for 1 October (TBC). A wider campaign to highlight pro-business support will be needed in some form from October but knowing that we need longer term planning and development to support behaviour change.

Dependencies: Internal staff conversations, agreement of proactive approach, agreement of comms plan and key messages.

Who will oversee the project's delivery: [redacted] but Tim Bowden and strategic team will support to cover annual leave from 17 September to 8 October.

What's needed:

- Assign delivery leads (press, social, design) – [redacted] has been involved in initial conversations and will continue to be the contact for social
- Delivery leads to feed into comms plan with plan for phase one approach (**urgent**)
- Press lead to develop lines to take for phase 1
- Delivery leads to manage delivery of the comms plan with oversight from CBP

Is it in F2V: No – see important note above

Is it on the campaign tracker: No – see important note above

Is it on the guidance tracker: N/A

Delivery leads:

Social: Lisa

Design:

Press:

CBP: [redacted]



[redacted]

Communications Business Partner
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow,
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From: [Tim Bowden](#)
To: [REDACTED]
Cc: [Faye Spencer](#)
Subject: RE: Comms plan
Date: 19 September 2024 12:43:00
Attachments: [image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)
[image017.png](#)

Thanks Katy. In the interests of making progress, a priority is getting sign-off on the comms recommendation for handling the immediate changes. These changes are referred to as phase 1 in the draft comms plan. Is that Louise and Faye on the project side – will you coordinate?

It looks like Faye returns on Monday, so if the three of us can meet to take stock then, that would be helpful.

We have multiple time-sensitive projects running in the team, and finite resources, so I'd also be grateful if you can let me know asap if in the coming days the date of 1 October changes or looks likely to change.

The work in progress comms plan is here: [Comms Plan_Business advice channel shift.docx](#)

For ease, here's a summary of the comms recommendation for phase 1:

Taking a proactive approach places us on the front foot and helps us to control the narrative and the message. It allows us to get ahead of any potential negative comments or reactions from businesses, stakeholders, media and those with an interest in the ICO's activities and maintain trust in the organisation. We recommend a proactive approach that is honest about the changes and provides reassurance that the ICO is still here to support businesses, it will just look a bit different.

Comms handling:

- Publish a statement on the ICO website, on the homepage in relevant sections, in the run up to 1 October [date TBC but would suggest the week before] announcing the date of the upcoming change, acknowledging that businesses may find the new system a step change but provide reassurance that the ICO is still here to help and provide a high quality service.
- Publish the statement on all of the ICO's social channels (excluding TikTok) and be prepared to respond to the questions that arise (eg why are you doing this, how do I contact you now, why are you increasing the DP fee but cutting your services etc).
- Agree a set of FAQs and lines to take about the changes and use these to answer questions directed through our channels or the media.
- Update the 'Contact us' page on the website to reflect the move towards self-service, and any other touch points that direct people to call the ICO.

Key messages:

- These changes reflect the ICO's move towards a modern service that provides simple but comprehensive online tools that give businesses the certainty they need.
- We understand that this is a different approach, but directing our resources to improving our online tools and resources will give businesses instant access to the ICO's advice and expertise 24/7.
- We are committed to making compliance with data protection law as easy as possible for small businesses, supporting them to grow through the responsible use of information.

Thanks
Tim



Tim Bowden
Head of Strategic Communications

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 313 1638 [ico.org.uk](#) [twitter.com/iconews](#)
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From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Thursday, September 19, 2024 11:09 AM
To: Tim Bowden <Tim.Bowden@ico.org.uk>
Cc: Faye Spencer <Faye.Spencer@ico.org.uk>
Subject: RE: Comms plan

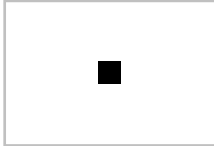
Hi Tim,

It would be great to see the comms plan so far. Faye is not around today and definitely has the most knowledge on this area of work. I am happy to meet or I can book something in with Faye when she is back in.

Faye is meeting with the TU's tomorrow, and after that early next week will share more comms with the impacted teams. Faye and I are meeting with Internal Comms on Tuesday, please let me know if you would like me to extend the invite to a member of your team.

Kind regards

Katy



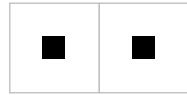
Project Manager – Transformation and Delivery

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

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From: Tim Bowden <Tim.Bowden@ico.org.uk>

Sent: Thursday, September 19, 2024 10:31 AM

To: [REDACTED] <[REDACTED]@ico.org.uk>

Cc: Faye Spencer <Faye.Spencer@ico.org.uk>

Subject: RE: Comms plan

Thanks Katy

I can give you access to the comms plan as it stands, which sets out our recommended approach for the immediate changes. It would be helpful for us to talk, today if possible, as there a number of outstanding questions. I'd also like to understand the latest on internal awareness of these changes.

I am free noon-1pm if that works for you?

Tim



Tim Bowden

Head of Strategic Communications

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

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From: [REDACTED] <[REDACTED]@ico.org.uk>

Sent: Thursday, September 19, 2024 9:16 AM

To: Tim Bowden <Tim.Bowden@ico.org.uk>

Cc: Faye Spencer <Faye.Spencer@ico.org.uk>

Subject: RE: Comms plan

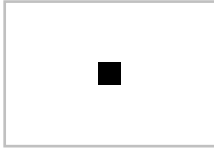
Hi Tim,

In terms of meetings we have a daily stand up meeting with DDaT and Bi weekly Programme meetings every Tuesday and Thursday. It would be great if a member of comms could join those. We have a full timeline that we discuss at those meetings.

Separately I am also supporting with the fee modelling work, we have had a request from DSIT post about the consultation on our social media. I think Louise Byers has been in touch about this. Please could I get an update?

Thanks

Katy



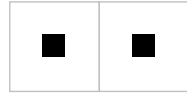
Project Manager – Transformation and Delivery

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

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From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Wednesday, September 18, 2024 9:28 AM
To: [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>
Cc: Faye Spencer <Faye.Spencer@ico.org.uk>
Subject: Re: Comms plan

Hi - yes the comms plan work has been commissioned in the team. What I would like to know please is when your meeting is and any time frames that have been discussed (other than the stated go-live date) so I can pick this up with the people leading on the work tomorrow. Thanks

Tim

From: [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>
Sent: Wednesday, September 18, 2024 8:58 AM
To: Tim Bowden <Tim.Bowden@ico.org.uk>
Cc: Faye Spencer <Faye.Spencer@ico.org.uk>
Subject: RE: Comms plan

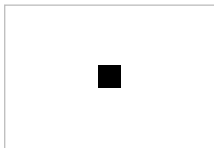
Hello Tim,

Last Tuesday Claire shared an email

"In terms of the self-service drive, I'm aware of that workstream through Faye. I am sighted on the high-level plan so far and am pulling together a plan that sets out the communications risks and opportunities, and a proposed comms approach. As well as the initial positioning of the changes with will look longer term at how we promote the new SARs and direct marketing tools, and any future iterations. Once the plan is further along, I'll share a copy with you so that Faye, Suzanne and Louise can help fill any gaps and give their steer and approval on the approach. As I'm on leave when this is due to go live at the start of October, someone else in the team will help take it forward while I'm away. I'll let you know who this will be".

As the change will take place on the 1 October we don't have much time to get everything in place. There will also need to be changes to the website content, would a member of the comms team support with this.

Thanks



Project Manager – Transformation and Delivery

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

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From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Wednesday, September 18, 2024 8:26 AM
To: [REDACTED] <[REDACTED]@ico.org.uk>
Cc: Faye Spencer <Faye.Spencer@ico.org.uk>
Subject: Re: Comms plan

Hi [REDACTED] - apologies, I've been out of the office and am out today too, as is the rest of the Comms team. Claire commissioned this work from the team before she went on leave - I'll check on progress tomorrow. Did you agree timelines with Claire? When is your meeting please?
Tim

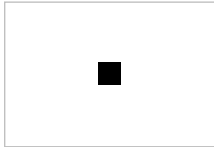
From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Tuesday, September 17, 2024 5:40:32 PM
To: Tim Bowden <Tim.Bowden@ico.org.uk>
Cc: Faye Spencer <Faye.Spencer@ico.org.uk>
Subject: Comms plan

Hi Tim,

Sorry to chase, do you think the comms plan for self-service drive will be available this week.

Kind regards

[REDACTED]



[REDACTED]

Project Manager – Transformation and Delivery

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

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From: [REDACTED]
Sent: Monday, September 16, 2024 5:18 PM
To: Tim Bowden <Tim.Bowden@ico.org.uk>
Subject: FW: CE: Research Feedback

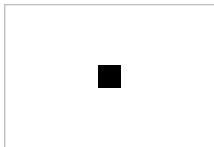
Hi Tim,

I hope all is good with you.

Is it possible for you to give me a timeframe for the comms plan? I have a meeting with Louise Locke and the programme sponsors and would like to update them on this if possible.

Thanks

[REDACTED]



[REDACTED]

Project Manager – Transformation and Delivery

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

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From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Friday, September 13, 2024 3:57 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: RE: CE: Research Feedback

Hi [REDACTED]

Just to update you, Tim Bowden is going to be the strategic lead for this piece of work while I'm away so please go to him for anything in the first instance. He will share a copy of the comms plan once we've mapped out our suggested approach.

In terms of the DP fee acquisition work, if you need comms to review the emails being sent under the third party fee finder work, our Insight and Evaluation Managers [REDACTED] and [REDACTED] are best placed to support. I've made them aware this is happening and they have confirmed that they are happy to advise. In terms of additional comms or adapting our additional messaging, [REDACTED] is our social media lead. Again, I've let him know what's happening in terms of additional letters and the email campaign so please do contact him direct in my absence to discuss any comms.

I'll be back on 8 October so can pick up again from that date.

Have a lovely weekend.

[REDACTED]



[REDACTED]
Communications Business Partner
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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From: [REDACTED]
Sent: Thursday, September 12, 2024 11:03 AM
To: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: RE: CE: Research Feedback

Thanks, [REDACTED] Don't worry, I am aware that BAS staff do not yet know about the proposed changes and that conversations still need to happen with the trade unions. I've made our team aware that the info we have is not for onward sharing at this stage.

We have a meeting this afternoon to discuss how comms can best support so I should have a clearer idea after that of when we're likely to have a plan to share with you. There are still a lot of unknowns, so whatever we produce will just be a draft, but at least it gives us a starting point.

[REDACTED]



[REDACTED]
Communications Business Partner
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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From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Wednesday, September 11, 2024 4:48 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: RE: CE: Research Feedback

Hi [REDACTED]

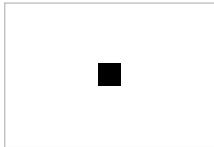
Thanks for coming back to me.

The organisation will send the emails from an ICO domain, we are in the process of getting it set up with our tech team.

For the self-service drive you may already know but it is not for wider sharing yet, the plan is that in early October the Business Advice Services will be turned off and colleagues from that area will support with work in payments and penalties (I call it Registration but I think that is outdated). We will need to talk to the TU's and affected colleagues. I know these are internal matters but thought it was helpful for you to know. Do you have an estimated date of when the plan will be ready, just so that I can put it on my timeline?

Kind regards

[REDACTED]



[REDACTED]

Project Manager – Transformation and Delivery

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

T. [REDACTED] F. 01625 545876 [ico.org.uk](mailto:[REDACTED]@ico.org.uk) twitter.com/iconews

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From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Tuesday, September 10, 2024 5:07 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: RE: CE: Research Feedback

Hi [REDACTED]

Thanks for getting in touch.

That's useful information about the pilot at the end of October. We can definitely look at our social messaging and adapt that to reflect that businesses may now be contacted by email. Will the organisation sending the emails be doing so as the ICO, or will it be under their own name on behalf of the ICO? That will affect how we approach our messaging so would be good to get clarification on how they're approaching it.

My team can absolutely support review of the email content, but just to let you know that I'm on leave from next Tuesday (17 September) until 8 October. I imagine you'll need input from us before I return so I can check who is best place to help in my absence – I think it will probably be either Marianne or Anna (our insight and evaluation managers) as they were heavily involved in crafting the letters.

In terms of the self-service drive, I'm aware of that workstream through Faye. I am sighted on the high-level plan so far and am pulling together a plan that sets out the communications risks and opportunities, and a proposed comms approach. As well as the initial positioning of the changes with will look longer term at how we promote the new SARs and direct marketing tools, and any future iterations. Once the plan is further along, I'll share a copy with you so that Faye, Suzanne and Louise can help fill any gaps and give their steer and approval on the approach. As I'm on leave when this is due to go live at the start of October, someone else in the team will help take it forward while I'm away. I'll let you know who this will be.

Hope that all makes sense. Happy to have a quick call if that would be useful.

[REDACTED]

From: [Tim Bowden](#)
To: [REDACTED]
Cc: [Dave Murphy](#)
Subject: RE: NEW WORK: Business advice channel shift
Date: 23 September 2024 12:35:00
Attachments: [image002.png](#)

Thanks [REDACTED] Essentially, customers need to know what to do and in addressing that we can provide some wider assurance that put the changes into context.

We can do that briefly in a statement or additionally in more detail along the lines you/Lisa suggest below.

Depending what comes out of my meeting with Faye later, we could keep the initial proactive messaging limited to the ICO website and keep all the social options in our pocket – then take a view, depending on the reaction when the changes go live. It’s tricky because we have little insight into how this will land (including internally) and some outstanding questions on the changes themselves.

In all scenarios we’ll need the reactive FAQ and it might make sense to link to the statement on the website as part of responding to any questions received. Alice – you mentioned Lucy M will be picking up from Helen and Lucie this week – does Lucy need to be briefed?

Thanks
Tim



Tim Bowden
Head of Strategic Communications

Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
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From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Monday, September 23, 2024 11:16 AM
To: Tim Bowden <Tim.Bowden@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Cc: Dave Murphy <Dave.Murphy@ico.org.uk>
Subject: Re: NEW WORK: Business advice channel shift

Hi everyone,

Just got to the end of my emails from last week and to close any loops - Dave, Alive and I discussed the idea of a LinkedIn blog last week, in view that it'd likely be something we'd have in our back pocket if required, rather than something we'd go out with proactively (which sounds like what you were thinking too, [@Tim Bowden](#)).

[REDACTED] the social lead for this one, Tim, and she's going to drop you a line today if she hasn't already, but her thoughts on messaging for the blog are: an emphasis on how we're trying to switch our approach to add more value to businesses, and focusing our efforts on tools that help everyone vs one-to-one support via call centre.

Cheers,



Digital, Social and Creative Content Manager

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

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From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Thursday, September 19, 2024 1:06 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>

[REDACTED]@ico.org.uk>

Cc: [REDACTED]@ico.org.uk>

Subject: RE: NEW WORK: Business advice channel shift

Thanks Lucie, Alice

I've shared the comms plan as a work in progress with Katy because we need sign-off on our recommended approach (which is to be proactive) asap.

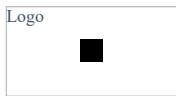
But I don't envisage a scenario where we won't need the FAQ doc and statement, either proactively or reactively, so if we can get cracking on those that would be helpful – thank you Lucie.

There are some draft KMs in the comms plan which are a good starter for a statement and developing the FAQs. Def support feeding these back through Katy for input from the project leads as we go, given the proposed timeframe.

And happy to recommend (and for us to do) a LinkedIn blog too if we feel that's a good route to our audience here.

Thanks all,

Tim



Tim Bowden
Head of Strategic Communications

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 313 1638 ico.org.uk twitter.com/iconews
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From: [REDACTED]@ico.org.uk>

Sent: Thursday, September 19, 2024 12:51 PM

To: [REDACTED]@ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>; [REDACTED]@ico.org.uk>; [REDACTED]@ico.org.uk>

Cc: [REDACTED]@ico.org.uk>

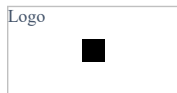
Subject: RE: NEW WORK: Business advice channel shift

Hi all,

Kate and I just discussed this briefly with Dave and he suggested a LinkedIn blog would be a good approach for this?

The press team's role as I understand it is to pull together some FAQs as requested and Helen/Lucie have started with that, and I think those can be used as the basis for a statement once it's agreed who is doing that part.

Thanks,
Alice



[REDACTED]
News Manager

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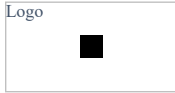
From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Thursday, September 19, 2024 12:46 PM
To: Tim Bowden <Tim.Bowden@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Subject: RE: NEW WORK: Business advice channel shift

Hey Tim,

Helen spoke to me about this this morning so I am going to look through the FAQ doc this afternoon and send this to Katy for her to add some answers. In terms of a statement, Helen and I were unsure who was doing this but I am happy to draft something based on the below if needs be?

Thanks,

[REDACTED]



[REDACTED]

Lead Communications Officer
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
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From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Thursday, September 19, 2024 10:18 AM
To: [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Subject: FW: NEW WORK: Business advice channel shift

Morning [REDACTED]

Can I check firstly that people know what they are being asked to do on this project, and secondly whether it has been progressed this week? (I appreciate we've had other things on).

As far as I know this work is still confidential but I'll be looking to catch up with [REDACTED] today or tomorrow.

Thanks
Tim



Tim Bowden
Head of Strategic Communications

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 313 1638 ico.org.uk twitter.com/iconews
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From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Tuesday, September 17, 2024 11:29 AM
To: [REDACTED] <[REDACTED]@ico.org.uk>; Comms - Managers [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: RE: NEW WORK: Business advice channel shift

Hi all,

This is going to require a bit of a group effort from the press team as we have a fair amount coming up. [REDACTED] has agreed to have a first look at it this week (with support from [REDACTED]) to start the thinking on Q&A etc, then [REDACTED] will pick it up when she's back next week to free up Helen and Lucie to concentrate on DPPC.

@Tim Bowden – worth noting that eagle-eyed Helen noticed that w/c 30 Sept is customer service week, so lots of internal comms planned on that on F2V, which may add an extra layer to proceedings.

Thanks,
Alice



News Manager

Please be aware I do not work on Wednesdays.

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From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Monday, September 16, 2024 11:41 AM
To: Comms - Managers [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: NEW WORK: Business advice channel shift

Note: [REDACTED] was involved in an initial discussion on this campaign and Kate has agreed that she will be the assigned social lead (Lisa is aware).

NEW WORK: Business advice channel shift

Project aims:

Phase 1: Introduce changes to our approach to providing business advice and ensure a smooth transition
Phase 2: Tell the story of the ICO's support for business and showcase the range of online resources available supporting behaviour change from phone to web contact

Comms aims:

Phase 1:

- Ensure information about the transition is available on all our channels to maintain openness and transparency
- Deliver clear and consistent messaging that positions the ICO as being an enabler of business
- Gather actionable insight to inform future phases of activity (specifically on messaging and communication channels)

Background

From 1 October there will be changes to the way the ICO provides advice to business customers. These changes are necessary to redirect Business Advice Services (BAS) resource to where it is needed the most.

The option to speak to the business advice team will be removed from the helpline and callers directed to start their enquiry journey online. A small number of additional staff will be made available to support live chat and where an enquiry is complex a call back can be offered. People with accessibility needs will be directed by recorded message (awaiting the detail).

This approach will be tested for up to three months and feedback gathered to understand the customer experience and help improve it through iterative changes.

Phase one, and the **priority**, is to communicate the changes in advance and provide reassurance that the ICO is still here to support businesses, it will just look a bit different. Phase two is to develop a long-term campaign that tells the story of how the ICO support businesses by showcasing the range of online resources available to use, quickly and easily, 24/7. DDaT is helping to improve website user journeys in the areas that the helpline receives the most calls – SARs and PDB – while tools to support direct marketing and privacy notices are either nearing completion or have already launched.

Further background information is in the comms plan: [\[REDACTED\] Comms Plan Business advice channel shift.docx](#).

I have also started a set of FAQs to help inform our LTT based on conversations so far but these will need to be added to and adapted with feedback from BAS: [Business advice line FAQs.docx](#)

Important note: the proposed changes have **not** yet been communicated to BAS staff. Conversations with trade unions are underway and nothing will happen until those discussions have concluded. If you need messaging signed off in the interim, please go through [redacted] project manager, who will make sure that the correct people are sighted. Internal Comms ([redacted]) is linked in and will be updated by Katy later this week.

Audiences for phase 1:

- Businesses already engaged with the ICO through our social channels and website

Timings: Advice line switch off scheduled for 1 October (TBC). A wider campaign to highlight pro-business support will be needed in some form from October but knowing that we need longer term planning and development to support behaviour change.

Dependencies: Internal staff conversations, agreement of proactive approach, agreement of comms plan and key messages.

Who will oversee the project's delivery: [redacted] but Tim Bowden and strategic team will support to cover annual leave from 17 September to 8 October.

What's needed:

- Assign delivery leads (press, social, design) – [redacted] has been involved in initial conversations and will continue to be the contact for social
- Delivery leads to feed into comms plan with plan for phase one approach (**urgent**)
- Press lead to develop lines to take for phase 1
- Delivery leads to manage delivery of the comms plan with oversight from CBP

Is it in F2V: No – see important note above

Is it on the campaign tracker: No – see important note above

Is it on the guidance tracker: N/A

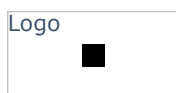
Delivery leads:

Social: Lisa

Design:

Press:

CBP: [redacted]



[redacted]
Communications Business Partner
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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From: [Tim Bowden](#)
To: [Faye Spencer](#); [REDACTED]; [REDACTED]
Cc: [REDACTED]
Subject: Business advice channel shift - comms handling and products
Date: 24 September 2024 14:56:53
Attachments: [image002.png](#)

Afternoon all

Quick email to connect us all on the comms products for handling the upcoming changes. The 1 October go-live date is still tbc but I'd suggest we aim to publish a statement two business days prior to the date returning customers will detect any changes - so the sooner we can get drafts agreed this week, the better.

The comms objectives and suggested key messages are [in the comms plan](#) but to recap, the relevant objectives for these initial comms are:

- Ensure information about the transition is available on our channels to maintain openness and transparency
- Deliver clear and consistent messaging that positions the ICO as being an enabler of business

The core products are:

1. Statement for ICO website

Actions: **Lucy** to draft; **Comms** to publish at date/time/area of website tbc

2. Reactive FAQs. Draft in progress: [Business advice line FAQs.docx](#)

Actions: **All** to add any additional questions we anticipate from customers or other interested parties; **Faye/BAS** to review draft answers and add missing answers

[@Faye Spencer](#) I'm assuming you'll be signing off both products on the BAS side, but please let me know if you will be escalating to someone else for sign-off. Lucy will liaise with you and [@](#)[REDACTED] re the draft statement.

Can you also please come back to me asap to confirm you/Louise are happy with the approach recommended in the comms plan?

Thanks
Tim



Tim Bowden
Head of Strategic Communications

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 313 1638 ico.org.uk twitter.com/iconews
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From: [Tim Bowden](#)
To: [Faye Spencer](#); [REDACTED]
Cc: [REDACTED]
Subject: RE: Business advice channel shift - comms handling and products
Date: 24 September 2024 15:07:00
Attachments: [image002.png](#)

Adding Mandy for completeness – we spoke earlier, but it will be important to cross-reference the internal comms with the FAQ to ensure we have consistent messages where there’s crossover between topics we intend to cover internally and would also comment on externally
Tim



Tim Bowden
Head of Strategic Communications

Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
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From: Tim Bowden
Sent: Tuesday, September 24, 2024 2:57 PM
To: Faye Spencer <Faye.Spencer@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: Business advice channel shift - comms handling and products

Afternoon all

Quick email to connect us all on the comms products for handling the upcoming changes. The 1 October go-live date is still tbc but I’d suggest we aim to publish a statement two business days prior to the date returning customers will detect any changes - so the sooner we can get drafts agreed this week, the better.

The comms objectives and suggested key messages are [in the comms plan](#) but to recap, the relevant objectives for these initial comms are:

- Ensure information about the transition is available on our channels to maintain openness and transparency
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The core products are:

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2. Reactive FAQs. Draft in progress: [Business advice line FAQs.docx](#)

Actions: **All** to add any additional questions we anticipate from customers or other interested parties;
Faye/BAS to review draft answers and add missing answers

[@Faye Spencer](#) I’m assuming you’ll be signing off both products on the BAS side, but please let me know if you will be escalating to someone else for sign-off. Lucy will liaise with you and [@](#)[REDACTED] re the draft statement.

Can you also please come back to me asap to confirm you/Louise are happy with the approach recommended in the comms plan?

Thanks
Tim



Tim Bowden
Head of Strategic Communications

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From: [Tim Bowden](#)
To: [Sean Kilgallon](#); [Faye Spencer](#); [Robert Johnson](#); [Business Advice Services Managers](#); [REDACTED]
Cc: [REDACTED]
Subject: RE: Business advice line FAQs
Date: 25 September 2024 13:27:00

Thanks all for the ongoing input. I'm copying in [REDACTED] and [REDACTED] for awareness, because the master copy of this FAQs doc is on Sharepoint and we should guard against having two documents being worked on independently of each other.

Faye and Katy – when you're satisfied with the feedback / answers, can you please overwrite the Sharepoint doc? That way we'll have one up-to-date version of the truth.

Thanks
Tim



Tim Bowden
Head of Strategic Communications
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 313 1638 ico.org.uk twitter.com/iconews
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From: Sean Kilgallon <Sean.Kilgallon@ico.org.uk>
Sent: Wednesday, September 25, 2024 12:58 PM
To: Faye Spencer <Faye.Spencer@ico.org.uk>; Robert Johnson <Robert.Johnson@ico.org.uk>; Business Advice Services Managers [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>
Subject: RE: Business advice line FAQs

Hi Faye,

I've made a few tracked comments/suggestions on the attached.

Thanks
Sean



Sean Kilgallon
Team Manager – Business Advice Services
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 414 6005 F. 01625 524510 ico.org.uk twitter.com/iconews
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From: Faye Spencer Faye.Spencer@ico.org.uk
Sent: Wednesday, September 25, 2024 9:00 AM
To: Robert Johnson Robert.Johnson@ico.org.uk; Business Advice Services Managers [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>; Tim Bowden Tim.Bowden@ico.org.uk
Subject: Business advice line FAQs

Morning

Ahead of the meeting Katy has set up for tomorrow, could you please have a look at the attached? Tim has started off a list of FAQs which we will use to respond to any questions we get about the channel shift initiative. I've added into these but would appreciate it if you could also take a quick look and see if there's anything else we need to add to the Qs or the As.

Thanks

Faye

From: [REDACTED]
To: [Helen Raftery](#); [Faye Spencer](#)
Cc: [Faye Bower](#)
Subject: RE: Comms about the channel shift in business services
Date: 25 September 2024 20:06:00
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hello Helen,

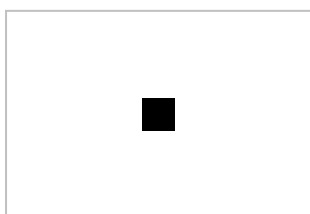
Thanks for your email. The original plan was to have comms for all business areas that could be impacted by the channel shift on Thursday/Friday, ahead of an Iris piece on Monday. I think we are able to push the Iris piece back by a few days but ideally we will still have contacted the business areas this week.

We have mapped all of the potential telephone entry points and will share some FAQ's and a script for any calls they may receive. I think it would be good to mention that there will be a line kept open for any customers who for accessibility reasons are not able to use self-serv or live chat.

Faye spoke to impacted colleagues in her area in person on Tuesday, and is probably best placed to confirm if your message below aligns with what was shared.

Kind regards

[REDACTED]



[REDACTED]

Project Manager – Transformation and Delivery

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

T. [REDACTED] F. 01625 545876 ico.org.uk
twitter.com/iconews

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From: Helen Raftery <Helen.Raftery@ico.org.uk>
Sent: Wednesday, September 25, 2024 4:12 PM

To: Faye Spencer <Faye.Spencer@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>

Cc: Faye Bower <Faye.Bower@ico.org.uk>

Subject: Comms about the channel shift in business services

Hi there

I hope you're keeping well.

Suzanne has pointed me in your direction to see if there are any planned comms in the pipeline that I can share with PADPCS colleagues about us turning off the phones in BAS.

I think the cat is out of the bag as I've had some questions today about it. It came up in a meeting that one of our LCOs attended earlier and so there have been concerns about the knock on effect for our live services and what we should do with calls that come through from orgs.

Suzanne mentioned that the start date was likely going to be pushed back until the middle of October and so I know there is still some time to put things in place – I could just do with pinged something round to stop the speculation. I know you are up to your eyes and so I have made a stab at writing something below that we could use if you're comfortable with it and if I have my facts straight. If it's wrong don't worry about sparing my feelings, I've written it very quickly!

Look forward to hearing from you soon.

Kind regards

Helen

Good morning all

I hope this finds you well.

I'm getting in touch to let you know about some planned changes that are being trialled in business services next month to help us grow the register and bring in more money.

From mid October we are planning to turn off the advice line for organisations for three months. Colleagues who would usually take these calls will instead focus on work to generate income. The IVR that customers listen to when they call us will be updated to reflect this change and there will be additional resources for organisations to self serve on the website. They will also still be able to contact us through livechat and email.

We don't plan to turn off the service for the public and so will continue to take calls as usual. However, we recognise that some organisations may come through on our lines.

There will be more information to follow describing what you should do if an organisation does this, and we'll of course be keeping an eye on call volumes to make sure that we have enough people to manage the service on shift.

We all know that fee generation is the top priority for the ICO and we're very supportive of our colleagues in business services. They have only been briefed about the plans this week and so the focus right now is ensuring they have what they need for this change.

We'll provide a further update in due course.

Kind regards

Faye and Helen

From: [Faye Spencer](#)
To: [Robert Johnson](#); [Business Advice Services Managers](#)
Cc: [REDACTED] [Tim Bowden](#)
Subject: Business advice line FAQs
Date: 25 September 2024 09:01:57
Attachments: [Business advice line FAQs.docx](#)

Morning

Ahead of the meeting Katy has set up for tomorrow, could you please have a look at the attached? Tim has started off a list of FAQs which we will use to respond to any questions we get about the channel shift initiative. I've added into these but would appreciate it if you could also take a quick look and see if there's anything else we need to add to the Qs or the As.

Thanks

Faye

DRAFT – requires BAS input and senior sign-off

Business Advice Line Q&A

Not for publication, these lines will be used:

- Consider responses to media and social media enquiries on a case-by-case basis by Comms
- To respond to questions from customers who contact BAS/ICO staff through the available ICO channels

Draft media/social responses must be signed off by: Faye Spencer tbc

NB: check against internal comms narrative for consistency

How can I get advice from the ICO?

There is lots of advice on our website, including practical written advice, video guides and interactive tools. Our guidance ranges from the comprehensive to the bite-sized, to cater for the different levels of support our customers need.

Why has the ICO closed the phone line for organisations?

Although we are encouraging more organisations to start their enquiry journeys online, this does not mean we are no longer providing phone support where it is needed. The ICO provides its expertise and support to businesses and other organisations in many different ways and the telephone helpline is a small part of our service. As a modern regulator, we know that businesses need access to high quality information around the clock. We already offer a wide range of simple but comprehensive online resources to help businesses get the answers they need, when they need them, and we will continue to develop these to meet our customers' needs. Where issues are particularly complex, our expert advisors will still be available to provide advice via livechat and where necessary, by phone.

The business advice line gets consistently good feedback. Why close it?

The ICO is modernising, and we understand that businesses want and expect to be able to access advice and support at any time. Modernising our service and investing in online tools, that provide simple but comprehensive help to get data protection right, will allow more organisations to begin their enquiry journeys online and get the certainty they need, when they need it. We are trialling this approach for three months and will review it at the end of that period.

Why are you doing this now?

In ICO25 we set out our intention to maximise our technical capability, to allow us realise the full benefits of digital tools to improve productivity, efficiency and the value we offer to fee payers and tax payers. By supporting more online customer journeys through providing extra online tools, more customers will be able to find the answers they need to the simpler questions they have, freeing up the time of our advisers to provide one-to-one advice on more complex matters.

What other changes will you be making? Will you be shutting your public helpline too?

There are no immediate plans to make any further changes to our helplines, but our services are always under review, to make sure we are providing the support our customers need as effectively and efficiently as we can.

Why are you putting up the DP fee up but cutting services?

The Department for Science, Innovation and Technology (DSIT) is responsible for setting the level of the data protection fee. Payment of the fee funds the ICO's work, which includes helping organisations of all sizes to comply with data protection law. The fee has remained static for a number of years and during this time the ICO has focused on providing value for money services and acting proportionately, but the current fee model no longer delivers the funding needed to achieve the ICO's objectives. We believe that the increase proposed in the consultation is proportionate and reasonable and will allow the ICO to continue to develop our offer to organisations.

This is the one reason I pay my DP fee. What do I get for my money now?

Our helplines are just one part of the service we provide to help organisations get data protection right. We provide a wide range of guidance, toolkits and resources, for large and small organisations, that help them make sense of data protection and save them time and money. Online services allow organisations to get an answer at any time of day and we are investing further in our online support to support customers. For example:

- We have launched a new Privacy Notice Generator, which provides small businesses with a bespoke privacy notice in just 15 minutes.
- Our new direct marketing tool will help small businesses quickly understand what they can and cannot do under the PECR legislation, helping them to safely grow their business.
- New SARs tool

I've been online and found an answer but I need clarification. How do I get it?

The ICO website includes an online chat facility. If you are unable to find the answer you need through our online guidance, you can use the online chat facility to raise your question and an advisor will help.

How do organisations contact the ICO if they are unable to go online?

We are committed to ensuring our services are inclusive and accessible for everyone. If you have accessibility needs that mean you are unable to use our website and live chat effectively, and you need a reasonable adjustment under the Equality Act 2010, please call our helpline number and select the relevant option.

I want to speak to a real person, how do I do that?

The ICO website includes an online chat facility. If you are unable to find the answer you need through our online tools, you can use the online chat facility to raise your question and an advisor will help. If they are unable to answer your query via chat, they may offer to call you back to discuss the matter further.

How does this approach support small businesses?

We know small business owners spend their working weeks looking after their businesses and customers, leaving little time to devote to compliance issues. By investing more of our resources in online tools, we are investing in products and services that are available at any time and whenever small businesses need them.

What is happening to the staff who worked on this line?

The staff who worked on this line continue to work hard to answer questions from a wide range of organisations, including through helping to develop our online tools and via our live chat and callback services.

From: [REDACTED]
To: [Tim Bowden](#)
Subject: FW: Channel shift - draft internal comms for Iris - 20240926
Date: 26 September 2024 14:46:37
Attachments: [Channel shift - draft internal comms for Iris - 20240926.docx](#)

Here you go...



[REDACTED]
Internal Communications Business Partner

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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From: Faye Spencer <Faye.Spencer@ico.org.uk>
Sent: Thursday, September 26, 2024 12:58 PM
To: [REDACTED]@ico.org.uk; Helen Raftery <Helen.Raftery@ico.org.uk>; Robert Johnson <Robert.Johnson@ico.org.uk>; [REDACTED]@ico.org.uk; [REDACTED] <[REDACTED]@ico.org.uk>
Subject: Channel shift - draft internal comms for Iris - 20240926

Hi

[REDACTED] – first draft of channel shift piece for IRIS.

[@Helen Raftery](#) – not the final version but should give you an idea of the way we're describing this if you need to send something to your team, given their proximity to us and the potential impact zone!

[@Robert Johnson](#) – can you let me know if there's anything I should or shouldn't be saying? This isn't the final version so no need to make amends, just let me know if the team are likely to be concerned by anything we are or aren't saying at this stage.

██████████ – sorry to drop this on you out of the blue, but just wanted you to be aware of what’s about to happen. It’s important that any messaging in the DPCC does not contradict any of this. We don’t want this pilot promoting, but we should make sure that we drop any obvious ‘call our helpline’ messages for non-fees related enquiries from organisations.

@██████████ – I’ve not added anything here to say that directly affected depts will be contacted separately as it’s quite long as it is. So, we need to make sure that they’re contacted in advance, which I know you’re on with.

Obviously this doc isn’t for further sharing at this stage!

Thanks

Faye

From: [Tim Bowden](#)
To: [Faye Spencer](#); [REDACTED]
Cc: [REDACTED]
Subject: RE: NOI start date agreed as 08/10/24
Date: 26 September 2024 09:08:00

Thanks Faye, Katy – to check I understand this correctly, we are putting things back and so we expect the earliest external comms to be w/c 7 October? Is that right – if so, I'll update Comms colleagues.

8 October is DPPC, so I'd recommend avoiding noticeable changes / potential additional disruption to our services (or perception of disruption) around that date.

Tim



Tim Bowden
Head of Strategic Communications

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
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From: Faye Spencer <Faye.Spencer@ico.org.uk>
Sent: Wednesday, September 25, 2024 6:11 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; Robert Johnson <Robert.Johnson@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; Business Advice Services Managers <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Cc: Traci Shirley <Traci.Shirley@ico.org.uk>; Suzanne Gordon <Suzanne.Gordon@ico.org.uk>
Subject: NOI start date agreed as 08/10/24

Hi

I've agreed with Louise that we will start sending our 50,000 NoI backlog from 8 October (rather than 1 October which had become the default position).

I've also explained that we won't do the full channel shift (significantly reduce support on the BAS lines), until the new SAR product is available (11 October). The Fees Service will send out a small amount of NoIs 8/9/10 October, to allow us to complete BAS staff training (they need to deal with some live service work, with support, to get confident enough to fly solo). **By the time we get to 11 October, there should be enough NoIs in the system and enough BAS staff trained on live service NoI work to necessitate us reducing the availability on that helpline, so that will effectively be our channel shift 'go live' date.**

Traci is going to update her timeline to reflect this and will share it ASAP, so please get rid of any previous copies.

Hannah – can you me know if the SAR product is not likely to be ready for 11 October? We're pretty much pegging the channel shift date to that.

Sue – we'll need to have the new P&P ICE queue in place ahead of that so we can train staff on that too.

Amanda – I'll still send you the first draft of the IRIS article tomorrow. Once we've agreed the wording between us, Louise wants to take a look. This new date allows time for that. Hopefully you're ok to find a slightly later slot for publication if necessary.

Thanks

Faye

Faye Spencer (she/her)
Head of Business Services

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 414 6716 F. 01625 524510 ico.org.uk twitter.com/iconews
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From: [REDACTED]
To: [Jenny Brotchie](mailto:jenny.brotchie@ico.org.uk)
Subject: Business Advice Services Channel shift pilot
Date: 30 September 2024 19:59:00
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hello,

I hope this email finds you well.

You may already have heard that as part of the Customer experience programme we're making a few changes in our Business Services department to help with collection of Data Protection fees from organisations who've failed to pay. Colleagues from our Business Advice Service (BAS) are stepping in to support our Data Protection (DP) Fees Service. This will mean that there will be a reduction in the lines open for non-fees related calls. Rather than calling our helpline, those customers will start their enquiry journey online and use the guidance and tools we already provide to find the answer to their query on our website. Customers with more complex questions who can't find the answer online, will be able to start a live chat with a BAS colleague and ultimately we'll still call them back immediately if we feel a more personal touch is needed to resolve the matter.

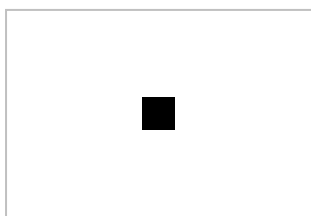
You are probably wondering why I am emailing you about this. As the Edinburgh Office telephone number is published on the ICO website, there is a possibility that you may see an increase in calls. I am hoping that you will be able to share this update with your colleagues in Edinburgh. There will be an update shared on IRIS on 3 October, but I wanted to let those who might be directly impacted know before then.

This is a pilot for 3 months and is expected to start on 8 October. Before that date we will share some FAQ's with any colleagues who may receive calls from customers who would have usually called BAS.

Please let me know if you have any questions.

Kind regards

[REDACTED]



[REDACTED]
Project Manager – Transformation and Delivery

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

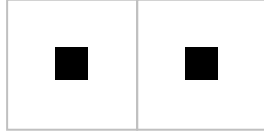
T. [REDACTED] F. 01625 545876 ico.org.uk

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email

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From: [REDACTED]
To: [Faye Spencer](#); [Robert Johnson](#); [REDACTED] [Helen Ward](#)
Cc: [Tim Bowden](#); [REDACTED]; [Helen Raftery](#)
Subject: RE: Channel shift - draft internal comms for Iris - 20240926
Date: 30 September 2024 16:14:16
Attachments: [image002.png](#)

Hi All

Apologies that I haven't managed to get this back to you earlier. I've reviewed and made some suggested amends to Faye's draft piece just to simplify it in line with our style guide and reduce word count -
[Channel shift - draft internal comms for Iris - 20240926 0.1.docx](#)

Please sense check and let me know if you are happy with the attached or would like to make further changes.

Just a reminder that this is scheduled to go out on Iris this Thursday 3 October – @ [REDACTED] presume that you have now engaged with all impacted teams and are happy to proceed with this date?

Copying [@Helen Ward](#) for visibility on comms.

Thanks



Internal Communications Business Partner

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From: Faye Spencer <Faye.Spencer@ico.org.uk>
Sent: Thursday, September 26, 2024 3:09 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>; Helen Raftery <Helen.Raftery@ico.org.uk>;

Robert Johnson <Robert.Johnson@ico.org.uk>; [REDACTED]
[REDACTED]@ico.org.uk; [REDACTED] <[REDACTED]@ico.org.uk>
Cc: Tim Bowden <Tim.Bowden@ico.org.uk>
Subject: RE: Channel shift - draft internal comms for Iris - 20240926

Thanks Mandy.

Yes, that's fine. Need to build in a bit of time for Louise's input.

Faye

From: [REDACTED]@ico.org.uk
Sent: Thursday, September 26, 2024 1:31 PM
To: Faye Spencer <Faye.Spencer@ico.org.uk>; Helen Raftery <Helen.Raftery@ico.org.uk>;
Robert Johnson <Robert.Johnson@ico.org.uk>; [REDACTED]
[REDACTED]@ico.org.uk; [REDACTED] <[REDACTED]@ico.org.uk>
Cc: Tim Bowden <Tim.Bowden@ico.org.uk>
Subject: RE: Channel shift - draft internal comms for Iris - 20240926

Thanks – will take a look.

Just to flag that I am off tomorrow - do you want me to push this back to Thursday 3 October to allow you more time given that you're not sending anything until 8?

Logo



[REDACTED]
Internal Communications Business Partner

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

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From: Faye Spencer <Faye.Spencer@ico.org.uk>

Sent: Thursday, September 26, 2024 12:58 PM

To: [REDACTED] ico.org.uk>; Helen Raftery <Helen.Raftery@ico.org.uk>; Robert Johnson <Robert.Johnson@ico.org.uk>; [REDACTED] [REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>

Subject: Channel shift - draft internal comms for Iris - 20240926

Hi

[REDACTED] – first draft of channel shift piece for IRIS.

[@Helen Raftery](#) – not the final version but should give you an idea of the way we’re describing this if you need to send something to your team, given their proximity to us and the potential impact zone!

[@Robert Johnson](#) – can you let me know if there’s anything I should or shouldn’t be saying? This isn’t the final version so no need to make amends, just let me know if the team are likely to be concerned by anything we are or aren’t saying at this stage.

[REDACTED] – sorry to drop this on you out of the blue, but just wanted you to be aware of what’s about to happen. It’s important that any messaging in the DPCC does not contradict any of this. We don’t want this pilot promoting, but we should make sure that we drop any obvious ‘call our helpline’ messages for non-fees related enquiries from organisations.

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Obviously this doc isn’t for further sharing at this stage!

Thanks

Faye

From: [REDACTED]
To: [Faye Spencer](#); [Robert Johnson](#); [REDACTED] [Helen Ward](#)
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Robert Johnson <Robert.Johnson@ico.org.uk>; [REDACTED]
[REDACTED]@ico.org.uk; [REDACTED] <[REDACTED]@ico.org.uk>
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Obviously this doc isn’t for further sharing at this stage!

Thanks

Faye

From: [REDACTED]
To: [REDACTED]
Subject: RE: Business advice line FAQs
Date: 02 October 2024 10:53:00
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Hi [REDACTED]

Thanks for adding this, that's great. I can tidy them up today so we have a final version. We can also send this to Louise so that she can review a final version!

I should have a draft website statement over for your review shortly.

Thanks,

[REDACTED]



[REDACTED]

Lead Communications Officer
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
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From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Tuesday, October 1, 2024 5:12 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: RE: Business advice line FAQs

Hi [REDACTED]

I have added the updated detail, happy to tidy it up a bit more if that would help? I have already shared a copy with Louise.

Please let me know if you need me to do anything else.

Thanks

[REDACTED]



[REDACTED]

Project Manager – Transformation and Delivery
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T. [REDACTED] F. 01625 545876 ico.org.uk twitter.com/iconews
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From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Tuesday, October 1, 2024 3:04 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: RE: Business advice line FAQs

Hi [REDACTED]

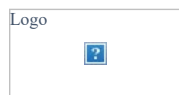
Hope you're well?

I just wanted to check in to see where you're up to with FAQ document – will you be overwriting the Sharepoint document with some updated answers soon please?



Thanks,















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From:  <@ico.org.uk>
Sent: Wednesday, September 25, 2024 1:37 PM
To: Tim Bowden <Tim.Bowden@ico.org.uk>; Sean Kilgallon <Sean.Kilgallon@ico.org.uk>; Faye Spencer <Faye.Spencer@ico.org.uk>; Robert Johnson <Robert.Johnson@ico.org.uk>; Business Advice Services Managers  <@ico.org.uk>;  <@ico.org.uk>;  <@ico.org.uk>
Subject: RE: Business advice line FAQs

Hi Tim,

Yes I can pick that up.

Thanks









Project Manager – Transformation and Delivery
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T.  F. 01625 545876 ico.org.uk twitter.com/iconews
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From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Wednesday, September 25, 2024 1:28 PM
To: Sean Kilgallon <Sean.Kilgallon@ico.org.uk>; Faye Spencer <Faye.Spencer@ico.org.uk>; Robert Johnson <Robert.Johnson@ico.org.uk>; Business Advice Services Managers <@ico.org.uk>;  <@ico.org.uk>;  <@ico.org.uk>
Cc:  <@ico.org.uk>
Subject: RE: Business advice line FAQs

Thanks all for the ongoing input. I'm copying in  and  for awareness, because the master copy of this FAQs doc is on Sharepoint and we should guard against having two documents being worked on independently of each other.

Faye and Katy – when you're satisfied with the feedback / answers, can you please overwrite the Sharepoint doc? That way we'll have one up-to-date version of the truth.

Thanks
Tim



Tim Bowden
Head of Strategic Communications

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 313 1638 ico.org.uk twitter.com/iconews
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From: Sean Kilgallon <Sean.Kilgallon@ico.org.uk>
Sent: Wednesday, September 25, 2024 12:58 PM
To: Faye Spencer <Faye.Spencer@ico.org.uk>; Robert Johnson <Robert.Johnson@ico.org.uk>; Business Advice Services Managers <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>
Subject: RE: Business advice line FAQs

Hi Faye,

I've made a few tracked comments/suggestions on the attached.

Thanks
Sean



Sean Kilgallon

Team Manager – Business Advice Services
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 414 6005 F. 01625 524510 ico.org.uk twitter.com/iconews
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From: Faye Spencer Faye.Spencer@ico.org.uk
Sent: Wednesday, September 25, 2024 9:00 AM
To: Robert Johnson Robert.Johnson@ico.org.uk; Business Advice Services Managers <[REDACTED]@ico.org.uk>
Cc: [REDACTED] [ico.org.uk](mailto:[REDACTED]@ico.org.uk); Tim Bowden Tim.Bowden@ico.org.uk
Subject: Business advice line FAQs

Morning

Ahead of the meeting Katy has set up for tomorrow, could you please have a look at the attached? Tim has started off a list of FAQs which we will use to respond to any questions we get about the channel shift initiative. I've added into these but would appreciate it if you could also take a quick look and see if there's anything else we need to add to the Qs or the As.

Thanks

Faye

From: [Tim Bowden](#)
To: [REDACTED]
Subject: Channel shift - ICO website statement
Date: 02 October 2024 16:15:00

Hi Lucy

Thanks for the draft. I've made some edits to the text and added a section on accessibility, which I think is an important public-facing message. I've also re-nosed it so we have a choice of drafts to offer. My preference is to lead on the first one, with the KM framing the changes upfront – but welcome your views before you send anything across.

Tim

Two versions:

Changes to our services for businesses

We are committed to modernising our service and investing in tools that enable us to give time-pressed businesses access to our advice and expertise 24/7. As part of this, from 11 October we will be piloting some changes to the way we provide businesses with advice and support.

Instead of first calling our phone line, businesses can access a wide and growing range of online resources to get the certainty they need on any data protection concerns.

Our expert advisers will still be on hand to provide businesses with additional support via the live chat facility and outbound calls. And we're committed to ensuring our services are inclusive and accessible for everyone: any customers who are unable to use our website and live chat effectively will still be able to speak to a staff member by phone as a first option.

Our aim remains to empower businesses of all sizes to get data protection right – making complying with the law as simple as possible and supporting them to grow through the responsible use of information.

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We appreciate this is a different approach but modernising our service and investing in our online tools enables us to give time-pressed businesses access to our advice and expertise 24/7. Our aim remains to empower businesses of all sizes to get data protection right – making complying with the law as simple as possible and supporting them to grow through the responsible use of information.



Tim Bowden
Head of Strategic Communications

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From: [Faye Spencer](#)
To: [REDACTED]; [Tim Bowden](#)
Cc: [REDACTED]; [Helen Ward](#)
Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2
Date: 02 October 2024 15:03:51
Attachments: [image002.png](#)

We're good to go on the IRIS article. No changes needed.

Thanks

Faye

From: Faye Spencer
Sent: Wednesday, October 2, 2024 12:27 PM
To: [REDACTED] ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>
Cc: [REDACTED] <[REDACTED] ico.org.uk>; Helen Ward <Helen.Ward@ico.org.uk>; [REDACTED] @ico.org.uk>
Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2

Hi

Not yet, but she knows she has it and that we need her to look at it today.

She's working out of the office, so looping in Cath from her Private Office, who also understands the timescales here.

Thanks

Faye

From: [REDACTED] ico.org.uk>
Sent: Wednesday, October 2, 2024 12:13 PM
To: Faye Spencer <Faye.Spencer@ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>
Cc: [REDACTED] <[REDACTED] ico.org.uk>; Helen Ward <Helen.Ward@ico.org.uk>
Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2

Hi Faye

Just checking in to see whether Louise has agreed the article. Ideally I need to get this drafted on Iris this afternoon ready for publishing in the morning. Also copying in [@Tim Bowden](#) in so he's in the loop.

Thanks

[REDACTED]
Internal Communications Business Partner

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From: Faye Spencer <Faye.Spencer@ico.org.uk>

Sent: Tuesday, October 1, 2024 10:02 AM

To: [REDACTED] <[REDACTED]@ico.org.uk>

Cc: [REDACTED] <[REDACTED]@ico.org.uk>; Helen Ward <Helen.Ward@ico.org.uk>

Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2

Will do. Thanks [REDACTED]

Faye

From: [REDACTED] <[REDACTED]@ico.org.uk>

Sent: Tuesday, October 1, 2024 8:31 AM

To: Faye Spencer <Faye.Spencer@ico.org.uk>

Cc: [REDACTED] <[REDACTED]@ico.org.uk>; Helen Ward <Helen.Ward@ico.org.uk>

Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2

Morning

Thanks for coming back so quickly – I've accepted all those changes. Do you want to send it to Louise for final sign off? I haven't included inbound and outbound – it feels like customer service jargon and may not mean as much to other people but if Louise really wants it, I can find a way to weave it back in...

[Channel shift - draft internal comms for Iris - 20240926 0.2.docx](#)

Let me know once everyone your end is happy with it.

Thanks



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Sent: Monday, September 30, 2024 6:33 PM

To: [REDACTED] <[REDACTED]@ico.org.uk>

Cc: [REDACTED] <[REDACTED]@ico.org.uk>

Subject: Channel shift - draft internal comms for Iris - 20240926 0.2

Hi

Just a couple of bits on here for you to have a look at.

Louise was quite keen we say something like we're replacing inbound calls with outbound ones. That's not made the cut. If you can find a place where that works better than where I had it, then that would be great. But not sure I'd die on a ditch about having it included.

Thanks

Faye

From: [Tim Bowden](#)
To: [Faye Spencer](#); [REDACTED]
Cc: [REDACTED] [Helen Ward](#)
Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2
Date: 02 October 2024 12:53:00
Attachments: [image002.png](#)

Thanks both. Faye - can I check the latest on the go-live date for the channel shift please – is it still 11 October?

We'd like to consider the language in the internal comms, once signed off, when we're finalising the draft external message (but can get something to you earlier if that's more helpful).

Tim



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Cc: [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; Helen Ward <Helen.Ward@ico.org.uk>; [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>
Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2

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Sent: Wednesday, October 2, 2024 12:13 PM
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Cc: [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; Helen Ward <Helen.Ward@ico.org.uk>
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Sent: Tuesday, October 1, 2024 10:02 AM
To: [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>; Helen Ward <Helen.Ward@ico.org.uk>
Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2

Will do. Thanks [REDACTED].

Faye

From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Tuesday, October 1, 2024 8:31 AM
To: Faye Spencer <Faye.Spencer@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>; Helen Ward <Helen.Ward@ico.org.uk>
Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2

Morning

Thanks for coming back so quickly – I’ve accepted all those changes. Do you want to send it to Louise for final sign off? I haven’t included inbound and outbound – it feels like customer service jargon and may not mean as much to other people but if Louise really wants it, I can find a way to weave it back in...

[Channel shift - draft internal comms for Iris - 20240926 0.2.docx](#)

Let me know once everyone your end is happy with it.

Thanks



[REDACTED]
Internal Communications Business Partner

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

From: Faye Spencer <Faye.Spencer@ico.org.uk>
Sent: Monday, September 30, 2024 6:33 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: Channel shift - draft internal comms for Iris - 20240926 0.2

Hi

Just a couple of bits on here for you to have a look at.

Louise was quite keen we say something like we’re replacing inbound calls with outbound ones. That’s not made the cut. If you can find a place where that works better than where I had it, then that would be great. But not sure I’d die on a ditch about having it included.

Thanks

Faye

From: [REDACTED]
To: [Louise Locke](#)
Cc: [REDACTED]; [Faye Spencer](#); [Private Office Customer Services](#)
Subject: RE: For review: final business advice line FAQ document
Date: 03 October 2024 11:20:00
Attachments: [image003.png](#)

Hi Louise

Thanks for your feedback – I've made that amend to "pilot."

Thanks,

[REDACTED]



[REDACTED]

Lead Communications Officer

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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From: Louise Locke <Louise.Locke@ico.org.uk>
Sent: Wednesday, October 2, 2024 2:33 PM
To: [REDACTED]@ico.org.uk
Cc: [REDACTED] <[\[REDACTED\]@ico.org.uk](mailto:[REDACTED]@ico.org.uk)>; Faye Spencer <Faye.Spencer@ico.org.uk>; Private Office Customer Services [REDACTED]@ico.org.uk
Subject: Re: For review: final business advice line FAQ document

Hi

These look very comprehensive

Only thing, 3rd question. Can we change the language from trial to pilot

Thanks
Louise

From: [REDACTED]@ico.org.uk>
Sent: Wednesday, October 2, 2024 1:13:32 PM
To: Louise Locke <Louise.Locke@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>; Faye Spencer <Faye.Spencer@ico.org.uk>
Subject: For review: final business advice line FAQ document

Hi Louise,

Hope you're well?

With thanks to Katy and the BAS team, I wanted to share the final version of the Business Advice Line FAQs for your review: [\[REDACTED\]_Business advice line FAQs.docx](#)

Thanks,

[REDACTED]



[REDACTED]

Lead Communications Officer

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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From: [REDACTED]
To: [Faye Spencer](#); [Tim Bowden](#)
Cc: [REDACTED] [Helen Ward](#)
Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2
Date: 03 October 2024 08:09:47
Attachments: [image002.png](#)

Morning all

This is now live [Re-prioritising the work of our Business Services \(sharepoint.com\)](#). Currently sitting second on the home page but we will be shifting up to main tile mid-morning.

Thanks



Internal Communications Business Partner

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

From: Faye Spencer <Faye.Spencer@ico.org.uk>
Sent: Wednesday, October 2, 2024 3:04 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>; Helen Ward <Helen.Ward@ico.org.uk>
Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2

We're good to go on the IRIS article. No changes needed.

Thanks

Faye

From: Faye Spencer

Sent: Wednesday, October 2, 2024 12:27 PM

To: [REDACTED] ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>

Cc: [REDACTED] <[REDACTED]@ico.org.uk>; Helen Ward <Helen.Ward@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>

Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2

Hi

Not yet, but she knows she has it and that we need her to look at it today.

She's working out of the office, so looping in Cath from her Private Office, who also understands the timescales here.

Thanks

Faye

From: [REDACTED] ico.org.uk>

Sent: Wednesday, October 2, 2024 12:13 PM

To: Faye Spencer <Faye.Spencer@ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>

Cc: [REDACTED] <[REDACTED]@ico.org.uk>; Helen Ward <Helen.Ward@ico.org.uk>

Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2

Hi Faye

Just checking in to see whether Louise has agreed the article. Ideally I need to get this drafted on Iris this afternoon ready for publishing in the morning. Also copying in [@Tim Bowden](#) in so he's in the loop.

Thanks



Internal Communications Business Partner

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

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

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Sent: Tuesday, October 1, 2024 10:02 AM
To: [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>; Helen Ward <Helen.Ward@ico.org.uk>
Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2

Will do. Thanks [REDACTED]

Faye

From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Tuesday, October 1, 2024 8:31 AM
To: Faye Spencer <Faye.Spencer@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>; Helen Ward <Helen.Ward@ico.org.uk>
Subject: RE: Channel shift - draft internal comms for Iris - 20240926 0.2

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[Channel shift - draft internal comms for Iris - 20240926 0.2.docx](#)

Let me know once everyone your end is happy with it.

Thanks



[REDACTED]
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From: Faye Spencer <Faye.Spencer@ico.org.uk>
Sent: Monday, September 30, 2024 6:33 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>
Cc: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: Channel shift - draft internal comms for Iris - 20240926 0.2

Hi

Just a couple of bits on here for you to have a look at.

Louise was quite keen we say something like we're replacing inbound calls with outbound ones. That's not made the cut. If you can find a place where that works better than where I had it, then that would be great. But not sure I'd die on a ditch about having it included.

Thanks

Faye

From: [REDACTED]
To: [REDACTED] [Faye Spencer](#)
Cc: [Tim Bowden](#)
Subject: For review: draft website statement for BAS channel shift
Date: 03 October 2024 12:12:12

Hi both,

Please see a draft statement for the ICO website to communicate the changes to the business advice line. We plan to trail the changes on the website a couple of days before the channel shift for transparency and to help manage expectations.

Please can you review and share any feedback ideally by COP on Friday?

Thanks,

[REDACTED]

Changes to our services for businesses

We are committed to modernising our service and investing in tools that enable us to give time-pressed businesses access to our advice and expertise 24/7. From 11 October, we will be piloting some changes to the way we provide support to businesses.

Instead of first calling our phone line, businesses can access a wide and growing range of online resources to get the certainty they need on any data protection concerns.

Our expert advisers will still be on hand to provide businesses with additional support via the live chat facility and outbound calls. And we're committed to ensuring our services are inclusive and accessible for everyone: any customers who are unable to use our website and live chat effectively will still be able to speak to a staff member by phone as a first option.

Our aim remains to empower businesses of all sizes to get data protection right – making complying with the law as simple as possible and supporting them to grow through the responsible use of information.

[Links to business advice pages of the website and contact us page.]



[REDACTED]

Lead Communications Officer

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

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

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

From: [David Teague](#)
To: [REDACTED]
Subject: RE: Business Advice Services Channel shift pilot
Date: 04 October 2024 09:28:44
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi [REDACTED]

Thanks for this. We are indeed aware of the shift, but always good to have things confirmed directly.

Due to staff issues here, we redirected all calls through to the main helpline a few months ago. The only calls that do come through to us are ones on our Welsh Language line, and the likelihood is that we won't be available to answer "live" but callers can leave a Welsh message for us and we call them back asap. People can still email us their queries - we forward these unless there's an obvious Welsh element to the query.

What might be useful is for us to monitor how things go over the next 3 months and evaluate the impact before reporting back – does that sound ok?

Thanks
Dave

Dave Teague
Acting Head of Welsh Affairs / Pennaeth Materion Cymreig Dros Dro

Information Commissioner's Office / Swyddfa'r Comisiynydd Gwybodaeth
Floor 2, Churchill House, Churchill Way, Cardiff, CF10 2HH
Llawr 2, Tŷ Churchill, Ffordd Churchill, Caerdydd, CF10 2HH
T/F 0330 414 6502 ico.org.uk twitter.com/iconews

From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Monday, September 30, 2024 8:01 PM
To: David Teague <David.Teague@ico.org.uk>
Subject: Business Advice Services Channel shift pilot

Hello,

I hope this email finds you well.

You may already have heard that as part of the Customer experience programme we're making a few changes in our Business Services department to help with collection of Data Protection fees from organisations who've failed to pay. Colleagues from our Business Advice Service (BAS) are stepping in to support our Data Protection (DP) Fees Service. This will mean that there will be a reduction in the lines open for non-fees related calls. Rather than calling our helpline, those customers will start their enquiry journey online and use the guidance

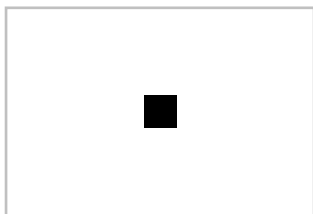
and tools we already provide to find the answer to their query on our website. Customers with more complex questions who can't find the answer online, will be able to start a live chat with a BAS colleague and ultimately we'll still call them back immediately if we feel a more personal touch is needed to resolve the matter.

You are probably wondering why I am emailing you about this. As the Cardiff Office telephone number is published on the ICO website, there is a possibility that you may see an increase in calls. I am hoping that you will be able to share this update with your colleagues. There will be an update shared on IRIS on 3 October, but I wanted to let those who might be directly impacted know before then.

This is a pilot for 3 months and is expected to start on 8 October. Before that date we will share some FAQ's with any colleagues who may receive calls from customers who would have usually called BAS.


Please let me know if you have any questions.

Kind regards



Project Manager – Transformation and Delivery

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

T.  F. 01625 545876 ico.org.uk

twitter.com/iconews

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From: [Faye Spencer](#)
To: [Tim Bowden](#); [REDACTED]
Cc: [REDACTED]
Subject: RE: For review: draft website statement for BAS channel shift
Date: 07 October 2024 10:48:26

Sorry – was off Thursday and Friday.

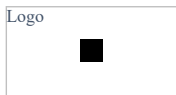
This looks good as it is.

Thanks

Faye

From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Monday, October 7, 2024 10:19 AM
To: [REDACTED] <[REDACTED]@ico.org.uk>; Faye Spencer <Faye.Spencer@ico.org.uk>
Cc: [REDACTED]@ico.org.uk
Subject: RE: For review: draft website statement for BAS channel shift

Morning both – just nudging this one. Any feedback please?
Tim



Tim Bowden
Head of Strategic Communications

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 313 1638 ico.org.uk twitter.com/iconews
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From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Thursday, October 3, 2024 12:12 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>; Faye Spencer <Faye.Spencer@ico.org.uk>
Cc: Tim Bowden <Tim.Bowden@ico.org.uk>
Subject: For review: draft website statement for BAS channel shift

Hi both,

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[REDACTED]

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Our aim remains to empower businesses of all sizes to get data protection right – making complying with the law as simple as possible and supporting them to grow through the responsible use of information.

[Links to business advice pages of the website and contact us page.]

[REDACTED]
Lead Communications Officer

Logo

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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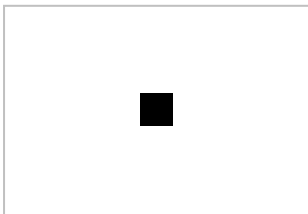
From: [REDACTED]
To: [Faye Spencer](#)
Subject: Channel shift - a few decisions required
Date: 07 October 2024 12:36:00
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi Faye,

At the catch up this morning it came up that staff have started asking what happens at 5pm if there are queues on live services. We talked about it and think we need to pick up with [REDACTED] to see if it will be possible to cut them off at this point. This would mean an IT change (if it is possible) but we probably need a decision from you first. This would also need to be factored into the IVR. I know Judy is trying to move the IVR forward, but we will need to decide what we do with this first.

Kind regards

[REDACTED]



[REDACTED]

Project Manager – Transformation and Delivery

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

T. [REDACTED] F. 01625 545876 ico.org.uk
twitter.com/iconews

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From: [REDACTED]
To: [REDACTED]; David Teague
Subject: RE: For action and info: comms for changes to business advice services and helpline
Date: 08 October 2024 14:06:26
Attachments: [image003.png](#)

Yeah think that's the most sensible option.



[REDACTED]
Support Officer / Swyddog Cymorth
Information Commissioner's Office, Second floor, Churchill House, Churchill Way, Cardiff, CF10 2HH
Swyddfa'r Comisiynydd Gwybodaeth, Ail Lawr, Tŷ Churchill, Ffordd Churchill, Caerdydd, CF10 2HH

Tel/Ffôn: [REDACTED]
ico.org.uk twitter.com/iconews

For information about what we do with personal data see our [privacy notice](#) / I gael gwybodaeth am yr hyn yr ydyn ni'n ei wneud â data personol, gweler ein [hysbysiad preifatrwydd](#)

Please consider the environment before printing this email / Ystyriwch yr amgylchedd cyn argraffu

We welcome correspondence in Welsh and this will not lead to any delays / Rydym yn croesawu gohebiaeth yn y Gymraeg ac ni fydd hyn yn arwain at oedi.

From: [REDACTED]@ico.org.uk
Sent: Tuesday, October 8, 2024 2:02 PM
To: [REDACTED]@ico.org.uk; David Teague <David.Teague@ico.org.uk>
Subject: RE: For action and info: comms for changes to business advice services and helpline

TLDR in the absence of pages available for the user journey, lets perhaps translate this statement and add a line at the top in Welsh advising that there are no changes for organisations who want to call our helpline through the medium of Welsh.



[REDACTED]
Lead Policy Officer / Swyddog Polisi Arweiniol

Information Commissioner's Office, 2nd floor, Churchill House, Churchill Way, Cardiff, CF10 2HH
Swyddfa'r Comisiynydd Gwybodaeth, Ail Lawr, Tŷ Churchill, Ffordd Churchill, Caerdydd, CF10 2HH

Tel/Ffôn: [REDACTED]
ico.org.uk twitter.com/iconews

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We welcome correspondence in Welsh and this will not lead to any delays / Rydym yn croesawu gohebiaeth yn y Gymraeg ac ni fydd hyn yn arwain at oedi.

From: [REDACTED]
Sent: Tuesday, October 8, 2024 2:00 PM
To: [REDACTED]@ico.org.uk; David Teague <David.Teague@ico.org.uk>
Subject: RE: For action and info: comms for changes to business advice services and helpline

Hello,

This is the first I've heard of any comms but looking at the user journey, its unlikely we have the capacity to translate as it stands. Not ideal but given the audience is BAS, its also unlikely to impact members of the public with bringing their concerns to us etc. I think the most sensible option is to ensure we're adding to the comms (perhaps the section below given that live chat is not available yn y gymraeg) with a sentence saying that our Welsh language helpline is still available to those wishing to access advice in Welsh.

Be ydych chi'n feddwl?

I want to speak to a real person, how do I do that?

Our live chat service should be your first port of call if you can't find the answers you need online, or you'd prefer to speak directly to one of our expert advisers. If you are unable to find the answer you need through our online resources, you can use the online chat facility to raise your question and an adviser will help. If they are unable to answer your query via chat, they may offer to call you back to

discuss the matter further. Please note, our Welsh language helpline is still available to those wishing to access advice and guidance through the medium of Welsh. Please call a member of our team on.....



Lead Policy Officer / Swyddog Polisi Arweiniol

Information Commissioner's Office, 2nd floor, Churchill House, Churchill Way, Cardiff, CF10 2HH
Swyddfa'r Comisiynydd Gwybodaeth, Ail Lawr, Tŷ Churchill, Ffordd Churchill, Caerdydd, CF10 2HH

Tel/Ffôn: [Redacted]

ico.org.uk twitter.com/iconews

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We welcome correspondence in Welsh and this will not lead to any delays / Rydym yn croesawu gohebiaeth yn y Gymraeg ac ni fydd hyn yn arwain at oedi.

From: [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>
Sent: Tuesday, October 8, 2024 1:45 PM
To: [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>; David Teague <David.Teague@ico.org.uk>
Subject: FW: For action and info: comms for changes to business advice services and helpline

A bit concerned on this and the WL impact. Should we be translating this statement or are we ok given they'd press 9 for Welsh advice?



Support Officer / Swyddog Cymorth

Information Commissioner's Office, Second floor, Churchill House, Churchill Way, Cardiff, CF10 2HH
Swyddfa'r Comisiynydd Gwybodaeth, Ail Lawr, Tŷ Churchill, Ffordd Churchill, Caerdydd, CF10 2HH

Tel/Ffôn: [Redacted]

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We welcome correspondence in Welsh and this will not lead to any delays / Rydym yn croesawu gohebiaeth yn y Gymraeg ac ni fydd hyn yn arwain at oedi.

From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Tuesday, October 8, 2024 1:30 PM
To: Comms - Communications Dept <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>; Private Office Commissioner <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>; Public Affairs & UK Teams <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>; Website Updates <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>
Cc: Faye Spencer <Faye.Spencer@ico.org.uk>; <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>
Subject: For action and info: comms for changes to business advice services and helpline

From 9am this Friday, 11 October, customers calling the ICO helpline seeking advice for organisations will be guided to the ICO website to start their enquiry through self-service. This will be a noticeable change for returning customers.

It's also a milestone for some significant work at pace internally (read more in [this Iris post](#)) including an ongoing role for Comms in prepping the new SAR tool and the communications plan post-launch.

For now – the key actions for Comms are:

1. Proactive comms handling

We'll be publishing the following statement on the ICO website at **10am tomorrow, Wed** ([@Website Updates](#) I'll email you separately):

Changes to our services for businesses

We are committed to modernising our service and investing in tools that enable us to give time-

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[Links to business advice pages of the website and contact us page]

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Business services is leading on internal join-up on the changes, including sharing the FAQ – in the first instance, please speak to [@](#) [redacted] if you need additional clarity.

Comms leads:

Social: [redacted]
Press: [redacted]
Web: [redacted] and team
Strategic: [@](#) [redacted] and me

Thanks
Tim



Tim Bowden
Head of Strategic Communications

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 313 1638 ico.org.uk twitter.com/iconews
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From: [Louise Locke](#)
To: [Tim Bowden](#); [Rob Holtom](#)
Subject: Re: For information: comms for changes to business advice services and helpline
Date: 08 October 2024 18:41:29
Attachments: [image002.png](#)

Great summary, many thanks Tim

From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Tuesday, October 8, 2024 4:21:52 PM
To: Louise Locke <Louise.Locke@ico.org.uk>; Rob Holtom <Rob.Holtom@ico.org.uk>
Subject: For information: comms for changes to business advice services and helpline

Hi Louise, Rob
Please see below the comms handling plan for the upcoming channel shift, which I'm sharing for information and assurance (no action required)
Thanks
Tim



Tim Bowden
Head of Strategic Communications

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 313 1638 ico.org.uk twitter.com/iconews
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From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Tuesday, October 8, 2024 1:30 PM
To: Comms - Communications Dept <[REDACTED]@ico.org.uk>; Private Office Commissioner <[REDACTED]@ico.org.uk>; Public Affairs & UK Teams <[REDACTED]@ico.org.uk>; Website Updates <[REDACTED]@ico.org.uk>
Cc: Faye Spencer <Faye.Spencer@ico.org.uk>; <[REDACTED]@ico.org.uk>
Subject: For action and info: comms for changes to business advice services and helpline

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Strategic: [@](#) [redacted] and me

Thanks
Tim



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FINAL: Business Advice Line Q&A

Reviewed by: [REDACTED] Faye Spencer, Louise Locke

Not for publication, these lines will be used:

- To consider responses to media and social media enquiries on a case-by-case basis by Comms
- To respond to questions from customers who contact BAS/ICO staff through the available ICO channels

Draft media/social responses must be signed off by Faye Spencer.

How can I get advice from the ICO now?

You can still access advice and expertise from the ICO – we offer a wide range of online resources which are available 24/7 to give you the certainty you need on topics such as SARs and data breaches. Our guidance ranges from the comprehensive to the bite-sized so it can cater for the different levels of support our customers need. If you are unable to find the answer you need through our online resources, our expert advisers will still be on hand to provide support via the live chat facility.

Why has the ICO closed the phone advice line for organisations?

We provide our expertise and support to businesses and other organisations in many different ways and the helpline is a small part of our service. As a modern regulator, we know that businesses need access to high quality information around the clock. We already offer a wide range of simple but comprehensive online resources to help businesses get the answers they need, when they need them. We will continue to develop and invest in these tools to ensure they meet our customer's needs.

Although we are encouraging more organisations to access advice online, this does not mean we are no longer providing phone support where it is needed. Where issues are particularly complex, our expert advisers will still be available to provide advice via the live chat and where necessary, by phone, if they feel that's required to resolve the matter.

The business advice line gets consistently good feedback. Why close it?

We understand that businesses want and expect to be able to access advice and support at any time. Modernising our service and investing in online tools, that provide simple but comprehensive help to get data protection right, will allow more organisations to begin their enquiry journeys online and get the certainty they need, when they need it. We are piloting this approach for three months and will review it at the end of that period.

Why are you doing this now?

In ICO25, we set out our intention to maximise our technical capability so we can realise the full benefits of digital tools to improve productivity, efficiency and the value we offer to fee payers and tax payers. By providing extra online tools,

more customers will be able to find the answers they need to the simpler questions they have, freeing up the time of our advisers to provide one-to-one advice on more complex matters.

What other changes will you be making? Will you be shutting your public helpline too?

There are no immediate plans to make any further changes to our helplines. Our services are always under review to make sure we are providing the support our customers need as effectively and efficiently as we can.

Why are you putting up the DP fee up but cutting services?

The Department for Science, Innovation and Technology (DSIT) is responsible for setting the level of the data protection fee. Payment of the fee funds our work, which includes helping organisations of all sizes to comply with data protection law. The fee has remained static for a number of years and during this time, we have focused on providing value for money services and acting proportionately. However, the current fee model no longer delivers the funding needed to achieve our objectives. We believe that the increase proposed in the consultation is proportionate and reasonable, ensuring we can continue to develop our offer to organisations.

The helpline is the main reason I pay my DP fee. What do I get for my money now?

Our helplines are just one part of the service we provide to help organisations get data protection right. We provide a wide range of guidance, toolkits and resources, designed for both large and small organisations, that help you understand data protection and cut the cost of compliance. Online services allow you to access support at any time of day and we are investing to further improve our online resources. For example:

- We have launched a new Privacy Notice Generator, which provides small businesses with a bespoke privacy notice in just 15 minutes.
- Our new direct marketing tool will help small businesses quickly understand what they can and cannot do under the PECR legislation, helping them to safely grow their business.
- New SARs tool

I've found an answer online but I need clarification. How do I get it?

We appreciate that you may want to seek clarification from us to ensure that you are getting data protection right for your organisation. If you are unable to find the answer you need through our online resources, our expert advisers will still be on hand to provide support and clarity via the online chat facility.

How do organisations contact the ICO if they are unable to go online?

We are committed to ensuring our services are inclusive and accessible for everyone. If you have accessibility needs that mean you are unable to use our

website and live chat effectively, and you need a reasonable adjustment under the Equality Act 2010, please call our helpline number and select the relevant option.

I want to speak to a real person, how do I do that?

Our live chat service should be your first port of call if you can't find the answers you need online, or you'd prefer to speak directly to one of our expert advisers. If you are unable to find the answer you need through our online resources, you can use the online chat facility to raise your question and an adviser will help. If they are unable to answer your query via chat, they may offer to call you back to discuss the matter further.

How does this approach support small businesses?

We are committed to making compliance with data protection law as easy as possible for small businesses, supporting them to get this right. We know small business owners spend their working weeks looking after their businesses and customers, leaving little time to devote to compliance issues. Our dedicated hub is packed with bite-sized information, tips and guides written with small organisations in mind. By investing more of our resources in online tools, we are investing in products and services that are available at any time of the day for time-pressed businesses.

What is happening to the staff who worked on this line?

The staff who worked on this phone line continue to work hard to answer questions from a wide range of organisations. They will be helping to develop our online tools and responding to enquiries via our live chat and callback service.

From: [Tim Bowden](#)
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: For action and info: comms for changes to business advice services and helpline
Date: 09 October 2024 16:12:00
Attachments: [image002.png](#)
[image003.png](#)

Absolutely [REDACTED] – copying this thought to [REDACTED] who'll be doing a quick-hit analysis of the impact over the first couple of days, looking at what we pick up from social / media. Would be good to pull inbox feedback into that too.
Tim



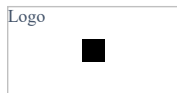
Tim Bowden
Head of Strategic Communications

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
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From: [REDACTED]@ico.org.uk
Sent: Wednesday, October 9, 2024 4:07 PM
To: Tim Bowden <Tim.Bowden@ico.org.uk>
Subject: RE: For action and info: comms for changes to business advice services and helpline

Will be interesting to see how this affects traffic to the website feedback inbox.



[REDACTED]
Administrative Assistant
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
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From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Tuesday, October 8, 2024 1:30 PM
To: Comms - Communications Dept [REDACTED]@ico.org.uk; Private Office Commissioner <[REDACTED]@ico.org.uk>; Public Affairs & UK Teams [REDACTED]@ico.org.uk; Website Updates [REDACTED]@ico.org.uk
Cc: Faye Spencer <Faye.Spencer@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
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Comms leads:

Social: [redacted]
Press: [redacted]
Web: [redacted] and team
Strategic: [@](#) [redacted] and me

Thanks
Tim



Tim Bowden
Head of Strategic Communications

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T. 0330 313 1638 ico.org.uk twitter.com/iconews
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From: [Tim Bowden](#)
To: [Publishing Alert](#)
Subject: Publishing alert: changes to our services for businesses
Date: 09 October 2024 12:40:15

All

We've published a statement about [changes to our services for businesses](#) that will take effect on Friday, 11 October. You can read more about the background to the changes in [this Iris post](#).

Tim



Tim Bowden
Head of Strategic Communications

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0330 313 1638 ico.org.uk twitter.com/iconews
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From: [Faye Spencer](#)
To: [REDACTED]; [REDACTED]
Cc: [Tim Bowden](#); [REDACTED]
Subject: RE: For action and info: comms for changes to business advice services and helpline
Date: 09 October 2024 09:55:56
Attachments: [image002.png](#)
[image003.png](#)

Thanks [REDACTED]. Not sure if we need another IRIS message, partic if it's busy, but we will need to re-contact the potentially affected orgs to remind them of the FAQs/pass on additional lines to take. But we can do that locally.

Faye

From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Wednesday, October 9, 2024 8:49 AM
To: [REDACTED] <[REDACTED]@ico.org.uk>; Faye Spencer <Faye.Spencer@ico.org.uk>
Cc: Tim Bowden <Tim.Bowden@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Subject: FW: For action and info: comms for changes to business advice services and helpline

Morning

Just following-up on Tim's email below and wanted to check whether you'd like us to add anything to the internal messaging around go live on Friday.

Our Iris schedule is particularly busy this week, but we could try and find space to pull Faye's blog back onto the home page with an addendum if you think it's helpful. Let me know.

Thanks



[REDACTED]
Internal Communications Business Partner

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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From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Tuesday, October 8, 2024 4:43 PM
To: [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>
Subject: RE: For action and info: comms for changes to business advice services and helpline

Thanks [REDACTED] [REDACTED] personal view is it would be helpful, given the sensitivity around info-sharing as this work came together.

You could flag the external announcement and link back to Faye's blog that explains the context. But the unknown here is customer behaviour once the switch happens: people could in theory dial into any ICO number.

Katy is happy to triage questions about process etc from eg Public Affairs colleagues, who might be on the receiving end, but you'd obvs want to speak to her/Faye before saying anything along those lines in comms: there are probably more relevant contacts in business services, if we're concerned about getting misdirected calls in any volume.

Tim



Tim Bowden
Head of Strategic Communications

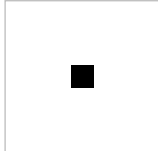
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From: [REDACTED]@ico.org.uk
Sent: Tuesday, October 8, 2024 4:28 PM
To: Tim Bowden <Tim.Bowden@ico.org.uk>
Cc: [REDACTED]@ico.org.uk
Subject: RE: For action and info: comms for changes to business advice services and helpline

Thanks Tim – Mandy was dealing with this one so I'll check with her in the morning.

[REDACTED]



[REDACTED]
Internal Communications Business Partner

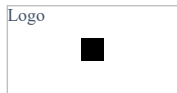
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From: Tim Bowden <Tim.Bowden@ico.org.uk>
Sent: Tuesday, October 8, 2024 1:46 PM
To: [REDACTED]@ico.org.uk; [REDACTED]@ico.org.uk
Subject: FW: For action and info: comms for changes to business advice services and helpline

Hi both – sharing for awareness. Worth speaking to Katy H if you think this would benefit from a further push internally, confirming the go-live date.



Tim Bowden
Head of Strategic Communications

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Social: [redacted]
Press: [redacted]
Web: [redacted] and team
Strategic: [@](#) [redacted] and me

Thanks
Tim



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From: [REDACTED]
To: [David Teague](mailto:David.Teague@ico.org.uk)
Subject: RE: Business Advice Services Channel shift pilot
Date: 16 October 2024 17:14:23
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi Dave,

Sorry for the slow reply. I hope things are going OK and you haven't felt the impact of this change too much. If you could monitor as suggested please that would be great.

Thanks

[REDACTED]



[REDACTED]

Project Manager – Transformation and Delivery

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

T. [REDACTED] F. 01625 545876 ico.org.uk

twitter.com/iconews

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From: David Teague <David.Teague@ico.org.uk>
Sent: Friday, October 4, 2024 9:29 AM
To: [REDACTED] <[REDACTED]@ico.org.uk>
Subject: RE: Business Advice Services Channel shift pilot

Hi [REDACTED]

Thanks for this. We are indeed aware of the shift, but always good to have things confirmed directly.

Due to staff issues here, we redirected all calls through to the main helpline a few months ago. The only calls that do come through to us are ones on our Welsh Language line, and the likelihood is that we won't be available to answer "live" but callers can leave a Welsh message for us and we call them back asap. People can still email us

their queries - we forward these unless there's an obvious Welsh element to the query.

What might be useful is for us to monitor how things go over the next 3 months and evaluate the impact before reporting back – does that sound ok?

Thanks
Dave

Dave Teague

Acting Head of Welsh Affairs / Pennaeth Materion Cymreig Dros Dro

Information Commissioner's Office / Swyddfa'r Comisiynydd Gwybodaeth
Floor 2, Churchill House, Churchill Way, Cardiff, CF10 2HH
Llawr 2, Tŷ Churchill, Ffordd Churchill, Caerdydd, CF10 2HH
T/F 0330 414 6502 ico.org.uk twitter.com/iconews

From: [REDACTED] <[REDACTED]@ico.org.uk>
Sent: Monday, September 30, 2024 8:01 PM
To: David Teague <David.Teague@ico.org.uk>
Subject: Business Advice Services Channel shift pilot

Hello,

I hope this email finds you well.

You may already have heard that as part of the Customer experience programme we're making a few changes in our Business Services department to help with collection of Data Protection fees from organisations who've failed to pay. Colleagues from our Business Advice Service (BAS) are stepping in to support our Data Protection (DP) Fees Service. This will mean that there will be a reduction in the lines open for non-fees related calls. Rather than calling our helpline, those customers will start their enquiry journey online and use the guidance and tools we already provide to find the answer to their query on our website. Customers with more complex questions who can't find the answer online, will be able to start a live chat with a BAS colleague and ultimately we'll still call them back immediately if we feel a more personal touch is needed to resolve the matter.

You are probably wondering why I am emailing you about this. As the Cardiff Office telephone number is published on the ICO website, there is a possibility that you may see an increase in calls. I am hoping that you will be able to share this update with your colleagues. There will be an update shared on IRIS on 3 October, but I wanted to let those who might be directly impacted know before then.

This is a pilot for 3 months and is expected to start on 8 October. Before that date we will share some FAQ's with any colleagues who may receive calls from customers who would have usually called BAS.

Please let me know if you have any questions.

Kind regards



Project Manager – Transformation and Delivery

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

T. [REDACTED] F. 01625 545876 ico.org.uk

twitter.com/iconews

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From: [REDACTED]
To: [Louise Locke](#); [Faye Spencer](#); [REDACTED] [Heather Turner](#)
Cc: [Angela Balakrishnan](#); [REDACTED] [Tim Bowden](#); [REDACTED]; [Private Office Comms Public Affairs](#)
Subject: Channel shift: Website traffic report
Date: 18 October 2024 16:56:11
Attachments: [2024-10-18 Channel shift \(website traffic analysis 11-17 Oct 2024\).pptx](#)

Hi all,

As promised, we have produced a week one snapshot report looking at the impact of the BAS channel shift on reputation and website traffic. Hopefully this will complement your own reporting.

In summary:

- No notable reputational impact – the only complaint we have received was a post on X with just 15 views (slide 5)
- Our public affairs and nations teams have reported a small increase in requests for support from BAS since the switch (slide 5)
- It seems like more people are staying on the website but behaving exactly the same as our usual web-based cohort (slide 10)
- Visits to the direct marketing advice generator are low but just over half (53%) are going on to receive tailored advice (slide 13)

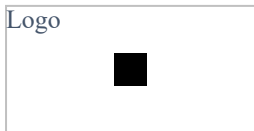
It is only one week of data and businesses don't use the helpline everyday so we will continue to monitor this. I'll provide an updated version of the report next Friday and again on 8th November. [@Louise Locke](#) – I can also chat through the report in the customer experience meeting next Wednesday so everyone has the same information.

Any questions, let me know.

Thanks,

[REDACTED]

Logo



[REDACTED]
Insight and Evaluation Manager
Information Commissioner's Office, Wycliffe House, Water Lane,
Wilmslow, Cheshire SK9 5AF
T. [REDACTED] F. 01625 524510 ico.org.uk
twitter.com/iconews

Please consider the environment before printing this email

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]
To: [Louise Locke](#); [Faye Spencer](#); [REDACTED] [Heather Turner](#)
Cc: [Angela Balakrishnan](#); [REDACTED] [Tim Bowden](#); [REDACTED] [Private Office Comms Public Affairs](#)
Subject: RE: Channel shift: Website traffic report
Date: 26 October 2024 18:51:11
Attachments: [2024-10-25 Channel shift \(website traffic analysis 11-24 Oct 2024\).pptx](#)

I had a flash of inspiration overnight and have been able to improve the content analysis in the channel shift report – making the findings on slides 14 and 15 more comprehensive and robust. Please accept my apologies and **use this version of the report**.

The broad findings remain unchanged but we now have more confidence in saying that, although we are keeping users on the website for longer, we haven't seen an uplift in visitors to the webpages that BAS would most-commonly recommend to helpline callers.

Thanks,

[REDACTED]



[REDACTED]

Insight and Evaluation Manager

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

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From: [REDACTED]
Sent: 25 October 2024 17:22
To: Louise Locke <Louise.Locke@ico.org.uk>; Faye Spencer <Faye.Spencer@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; Heather Turner <Heather.Turner@ico.org.uk>
Cc: Angela Balakrishnan <angela.balakrishnan@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; Tim Bowden <Tim.Bowden@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; [REDACTED] <[REDACTED]@ico.org.uk>; Private Office Comms Public Affairs <[REDACTED]@ico.org.uk>
Subject: RE: Channel shift: Website traffic report

Hi all,

As promised, I have attached an updated report into reputation and web traffic following the channel shift. The main things to note are:

- We aren't seeing any negative reputational impacts; and
- There is nothing alarming in the website visitor data. The stats suggest that the shift is keeping users on the website for longer.

There's a limit to what topline website visitor data can tell us about user reactions to the shift so it would be advisable to continue combining this with your own data on live chat/call volumes and user behaviour analysis from the UCD team. We'll update again on 8 November when we have a month's worth of stats to dive into.

I'm off next week but, if you have any questions, Anna is around.

Thanks,

[Redacted]



[Redacted]

Insight and Evaluation Manager

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

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From: [Redacted]

Sent: 18 October 2024 16:48

To: Louise Locke <Louise.Locke@ico.org.uk>; Faye Spencer <Faye.Spencer@ico.org.uk>; [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>; Heather Turner <Heather.Turner@ico.org.uk>

Cc: Angela Balakrishnan <angela.balakrishnan@ico.org.uk>; [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>; Tim Bowden <Tim.Bowden@ico.org.uk>; [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>; [Redacted] <[\[Redacted\]@ico.org.uk](mailto:[Redacted]@ico.org.uk)>; Private Office Comms

Public Affairs <[REDACTED]@ico.org.uk>

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In summary:

- No notable reputational impact – the only complaint we have received was a post on X with just 15 views (slide 5)
- Our public affairs and nations teams have reported a small increase in requests for support from BAS since the switch (slide 5)
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It is only one week of data and businesses don't use the helpline everyday so we will continue to monitor this. I'll provide an updated version of the report next Friday and again on 8th November. @Louise Locke – I can also chat through the report in the customer experience meeting next Wednesday so everyone has the same information.

Any questions, let me know.

Thanks,

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| **personal data see our [privacy notice](#)**



Business advice channel shift

Account manager:	Social lead: [REDACTED] Press lead, from 23 September: [REDACTED] Web lead: [REDACTED] Web support for DDaT ([REDACTED]/team - dependent on capacity) Design: [REDACTED]
Strategic lead:	[REDACTED] (contact Tim Bowden until 8 October)
Sign off trail:	Angela Balakrishnan, Executive Director – Strategic Communications and Public Affairs Faye Spencer, Head of Business Services (to liaise with Louise Locke, Executive Director if required) Coordinate sign off via [REDACTED], Project Manager

Objectives and key messages

Objectives

Overall project

Support a smooth transition away from helpline services to online, specifically:

- Protect the reputation of the ICO during the transition
- Ensure service users with accessibility needs are informed about how they can access support
- Drive users towards alternative services (eg live chat and online resources)

Phase 1 (initial launch)

- Ensure information about the transition is available on our channels to maintain openness and transparency
- Deliver clear and consistent messaging that positions the ICO as being an enabler of business
- Gather actionable insight to inform future phases of activity (specifically on messaging and communication channels)

Phase 2 (longer term business support)

- Promote the high-quality online offer the ICO provides for the DP fee, to empower businesses to get data protection right
- Help to drive the desired behaviour change, using insight to focus on those ICO tools that address the most common issues raised by callers to the helpline
- Drive positive sentiment / mitigate negative sentiment about future service changes, by positioning them as part of the ICO's commitment to continuously improve

High level key messages

- These changes reflect the ICO's move towards a modern service that provides simple but comprehensive online tools that give businesses the certainty they need.
- We understand that this is a different approach, but directing our resources to improving our online tools and resources will give businesses instant access to the ICO's advice and expertise 24/7.
- We are committed to making compliance with data protection law as easy as possible for small businesses, supporting them to grow through the responsible use of information.

Scoring/evaluation

Metrics for overall project

- **Objective 1:** Protect the reputation of the ICO during the transition.
 - 65% of all engagement via stakeholders, web, press and social media to be positive, balanced or neutral in tone.
- **Objective 2:** Ensure service users with accessibility needs are informed about how they can access support.
 - Complaints relating to service accessibility (both direct and across social) to remain at comparable levels to the pre-transition period.
- **Objective 3:** Drive users towards alternative services (eg live chat and online resources)
 - Increase in visits to signposted online services (specifically information on SARs, direct marketing and personal data breaches).
 - Increase in users of live chat services.
 - Reduction in overall call volumes (ie users aren't simply using other options to access helpline support).

Metrics for Phase 1 objectives (initial launch)

- **Objective 1:** Ensure information about the transition is available on our channels to maintain openness and transparency.
 - Information to be posted on website homepage and contact us page
 - Less than 10% of inbound enquiries about business advice to suggest that the ICO hadn't been open or transparent about the change.
- **Objective 2:** Deliver clear and consistent messaging that positions the ICO as being an enabler of business.
 - 90% of proactively issued content to include at least one of our high-level key messages about supporting businesses.
 - Less than 50% of reaction on social media to indicate that the ICO does not offer adequate support to businesses.
- **Objective 3:** Gather actionable insight to inform future phases of activity (specifically on messaging and communication channels).
 - List of actionable insights produced following phase 1 roll-out.
 - At least 50% of recommendations to be actioned in phase two communications activity.

Metrics for Phase 2 objectives (longer term business support)

Audiences and insight

Background

From **11 October** there will be noticeable changes to the way the ICO provides advice to business customers.

This 'channel shift' is necessary to redirect Business Advice Services (BAS) resource to where it is needed the most, primarily work to support data protection fee acquisition (payments and penalties).

Currently, callers to the ICO helpline (0303 123 1113) can choose from three options:

1. Data protection fee and registration advice
2. Advice for the organisation you work for
3. Member of the public

Option 2 will be removed and callers will be guided to the ICO website to start their enquiry through self-service.

A small number of additional case officers will be moved to the website's live chat. If a customer has a particularly technical enquiry, the chat agent will ask for their telephone number and make an outbound call to resolve their enquiry.

People with accessibility needs (for example, people unable go online) will be directed by recorded message – BAS is putting this in place.

This approach will be tested for up to **three months** and feedback gathered to understand the customer experience and help improve it through iterative changes.

There is a contingency plan (which BAS will lead on) that would turn the inbound call line back on (reinstate option 2) with a small team of call handlers. Promotion of self service would continue. This plan will be enacted if an unwieldy number of calls was going to other ICO lines or feedback indicates that we aren't meeting our customer's needs.

Audiences

Phase 1:

- Businesses already engaged with the ICO, who are most likely to perceive the changes

Phase 2:

- To be developed drawing on insight from phase 1

Insight

We know that the most common reasons for calling the helpline are for advice on:

- SARs – confusion over timeframes (eg getting confused with FOI, working days vs calendar days), is a request valid or is there a reason not to reply
- Direct marketing
- Personal data breaches – 66% of calls relate to we've had a breach/does it need reporting/how do we assess if it meets the threshold to report. Only 28% of callers to the PDB advice line have consulted the online guidance before calling (data recorded since April 2024)

BAS is working with DDaT to develop improved customer journeys on the website in these areas, including tools that will ask the customer questions to help them navigate through our guidance library. SARs guidance has been prioritised. The tool will have a feedback mechanism so that user feedback can inform future iterations, and will be developed for other topics in future.

We can bring in other existing, or in-development tools, under the self-service banner, and the wider pro-businesses messaging to showcase how the ICO uses the DP fee to help businesses cut the cost of compliance and enable responsible innovation and economic growth. Including:

- A new direct marketing click-thinking tool that will give a clear answer on electronic marketing questions/practices (launched at the start of October)
- The recently launched privacy notice generators
- Redesigned small organisations area on the website, making it easier to find what you need [in progress, timeframes TBC]
- A new SARS self-serve tool
- Anything else we already have that we can bring in here? Self-assessment checklists?

Risks and mitigations

Risk: The changes are happening quickly and with little warning, which could leave businesses confused and frustrated. **Mitigation:** The ICO will take a proactive approach to announcing the changes and will be open and transparent about the reasons. The information will be shared before the changes take place and provide reassurance that businesses will continue to be able to access the support they need.

Risk: The changes are happening at a time when DSIT is proposing to increase the cost of the DP fee. The perception could be that the ICO is cutting services while putting up the cost of compliance. **Mitigation:** We will demonstrate that the ICO, and the DP fee, offers value for money by showcasing the wide range of resources that businesses can already access for free, and the new tools that are continually being developed.

Risk: Other ICO phone numbers could be used as an alternative route for people seeking business advice, impacting other ICO services. **Mitigation:** BAS will monitor phone traffic to other public facing ICO numbers to track whether businesses are using other avenues to get in touch by phone. A contingency plan is in place should enquiries via other numbers become unmanageable.

Risk: Accessibility issues for people that cannot use online services and potentially excluding certain groups from being able to access and use a public service.

Mitigation: BAS will conduct an EQIA to ensure customers that need reasonable adjustments can still access services. An option will be included on the helpline options to ensure access is still available.

Risk: Online services do not meet user need and prompt complaints or additional calls from frustrated customers, which could also be shared online and cause reputational damage. **Mitigation:** BAS will capture data on the number of business advice calls and why the customer didn't get the help they needed on the website to help adapt content. A feedback mechanism will also be available as new tools are introduced to help inform future iterations. Comms will monitor web feedback for any comments specifically related to business advice content.

Risk: Key stakeholders want to know why they weren't told about or consulted on the changes. **Mitigation:** A proactive comms approach provides prior notification of the changes to already-engaged customers.

BAS has confirmed it will not be doing proactive stakeholder engagement prior to the changes, which could cause us to lose control of the message, could cause

unnecessary concern in advance, and could appear to be abdicating responsibility for sharing the information with businesses and expecting stakeholders to do it.

Risk: Staff in BAS are concerned by the new approach and the change to their role.

Mitigation: No comms, internal or external, will happen until trade unions have been consulted and staff informed. Internal Comms Business Partner [REDACTED] is supporting the project and a clear narrative will explain how the move supports the ICO's wider priorities and objectives. **Note:** content in our FAQs (for external use) must be consistent with any internal comms that cover the same themes, in edited form where appropriate (eg for brevity or to omit information that is for internal use only).

Strategy/idea

This is a long-term piece of work that will take a phased approach to tell the story of the service we provide to businesses. Phase 1 is to communicate the service changes happening from 11 October 2024.

Phase 1 – launch of changes

Web:

We'll be:

- publishing a statement on the ICO website and updating the contact us page
- There will be no proactive comms on other channels at this stage.

This will announce the date of the upcoming change, acknowledging that businesses may find the new system a change but provide reassurance that the ICO is still here to help and provide a high-quality service

Press and social

Agree reactive FAQs and lines to take about the changes and use these to answer questions directed at the ICO through our channels or the media: see [Draft FAQs doc](#)

Phase 2 – wider campaign to promote online resources

Press

To be added closer to time.

Social proactive

We'll run a "**self-service social media campaign**" until the end of 2024 that covers the most common reasons for calling the helpline: SARs, Direct Marketing and

PDBs. The messaging will be around how orgs can reassure themselves that they've interpreted guidance correctly. This will focus on **Twitter and Facebook**.

We'll run a social media campaign on our owned **Twitter and Facebook** that focuses on **the tools that that ICO has created that saves businesses time and money**, such as the direct marketing tool, and existing support such as the privacy notice generators.

Social reactive/intel

We'll use the LTTs where appropriate and track replies received, sentiment and conversation to see how this has landed.

Web

The team will:

- monitor the internal site search terms to ensure that the right pages are appearing.
- Look at SEO terms and Google trends and add keywords to text where relevant to ensure that the right ICO pages are appearing.

Optional proactive social and digital

If there's available resource the team may also:

- Explore if we can set up **an automated 6-week newsletter** on improving SAR compliance with steps orgs can take each week.
- Look at creating some short business focussed **Facebook reels** and **YouTube Shorts** that mirror the content from the "**self-service social media campaign**"
- Look at improving the SEO and search terms of existing **YouTube videos** to maximise existing content to reassure and help users understand the law.

Final results (Impact)

[To be added by communications team once all activity has been completed]

Communications objective	Outputs (eg what did you create or put out media coverage, social posts, blogs, web content)	Audience outtakes (eg how did people react to the outputs - engagement rate, shares, likes, comments, downloads, web visits)	Impact (ie evidence that the objective was achieved)
[Objective 1]			
[Objective 2]			
[Objective 3]			

Comms planning tools

Implementation plan

Timing	Action	Owner – a/c manager to make sure this happens	Notes
Sep/Oct	Sign off for comms approach	Louise / Faye	
"	sign off for key messages, FAQs and LTT	Louise / Faye	
"	Direct comms to affected BAS staff	Internal comms / Louise / Faye	
3 October	Post internal news story	Internal comms	
tbc	Stakeholder comms??	BAS has confirmed no prior engagement	
October	Post statement on ICO website	Comms	Now 9 October
October	Additional reminders of service changes on social media	Comms	Tbc – if judged necessary
11 October tbc	Go live of new recorded message removing option to speak to BAS	BAS	
October tbc	First evaluation review	Comms	
October tbc	Launch of phase 2 - first iteration of campaign to promote online resources	Claire	

Campaign tasks and responsibilities list

This is a [basic checklist of things to do](#) and people to tell during the planning and delivery of a comms campaign or project.

Internal audience list

Business Advice Service Managers,

Public Affairs Data Protection Complaints Service (PADPCS) Team Managers,

PADPCS Group Managers

Internal comms,
Public Affairs,
ICOR,
Relevant PACE team

FINAL: Business Advice Line Q&A

Reviewed by: [REDACTED], Faye Spencer, Louise Locke

Not for publication, these lines will be used:

- To consider responses to media and social media enquiries on a case-by-case basis by Comms
- To respond to questions from customers who contact BAS/ICO staff through the available ICO channels

Draft media/social responses must be signed off by Faye Spencer.

How can I get advice from the ICO now?

You can still access advice and expertise from the ICO – we offer a wide range of online resources which are available 24/7 to give you the certainty you need on topics such as SARs and data breaches. Our guidance ranges from the comprehensive to the bite-sized so it can cater for the different levels of support our customers need. If you are unable to find the answer you need through our online resources, our expert advisers will still be on hand to provide support via the live chat facility.

Why has the ICO closed the phone advice line for organisations?

We provide our expertise and support to businesses and other organisations in many different ways and the helpline is a small part of our service. As a modern regulator, we know that businesses need access to high quality information around the clock. We already offer a wide range of simple but comprehensive online resources to help businesses get the answers they need, when they need them. We will continue to develop and invest in these tools to ensure they meet our customer's needs.

Although we are encouraging more organisations to access advice online, this does not mean we are no longer providing phone support where it is needed. Where issues are particularly complex, our expert advisers will still be available to provide advice via the live chat and where necessary, by phone, if they feel that's required to resolve the matter.

The business advice line gets consistently good feedback. Why close it?

We understand that businesses want and expect to be able to access advice and support at any time. Modernising our service and investing in online tools, that provide simple but comprehensive help to get data protection right, will allow more organisations to begin their enquiry journeys online and get the certainty they need, when they need it. We are piloting this approach for three months and will review it at the end of that period.

Why are you doing this now?

In ICO25, we set out our intention to maximise our technical capability so we can realise the full benefits of digital tools to improve productivity, efficiency and the value we offer to fee payers and tax payers. By providing extra online tools,

more customers will be able to find the answers they need to the simpler questions they have, freeing up the time of our advisers to provide one-to-one advice on more complex matters.

What other changes will you be making? Will you be shutting your public helpline too?

There are no immediate plans to make any further changes to our helplines. Our services are always under review to make sure we are providing the support our customers need as effectively and efficiently as we can.

Why are you putting up the DP fee up but cutting services?

The Department for Science, Innovation and Technology (DSIT) is responsible for setting the level of the data protection fee. Payment of the fee funds our work, which includes helping organisations of all sizes to comply with data protection law. The fee has remained static for a number of years and during this time, we have focused on providing value for money services and acting proportionately. However, the current fee model no longer delivers the funding needed to achieve our objectives. We believe that the increase proposed in the consultation is proportionate and reasonable, ensuring we can continue to develop our offer to organisations.

The helpline is the main reason I pay my DP fee. What do I get for my money now?

Our helplines are just one part of the service we provide to help organisations get data protection right. We provide a wide range of guidance, toolkits and resources, designed for both large and small organisations, that help you understand data protection and cut the cost of compliance. Online services allow you to access support at any time of day and we are investing to further improve our online resources. For example:

- We have launched a new Privacy Notice Generator, which provides small businesses with a bespoke privacy notice in just 15 minutes.
- Our new direct marketing tool will help small businesses quickly understand what they can and cannot do under the PECR legislation, helping them to safely grow their business.
- New SARs tool

I've found an answer online but I need clarification. How do I get it?

We appreciate that you may want to seek clarification from us to ensure that you are getting data protection right for your organisation. If you are unable to find the answer you need through our online resources, our expert advisers will still be on hand to provide support and clarity via the online chat facility.

How do organisations contact the ICO if they are unable to go online?

We are committed to ensuring our services are inclusive and accessible for everyone. If you have accessibility needs that mean you are unable to use our

website and live chat effectively, and you need a reasonable adjustment under the Equality Act 2010, please call our helpline number and select the relevant option.

I want to speak to a real person, how do I do that?

Our live chat service should be your first port of call if you can't find the answers you need online, or you'd prefer to speak directly to one of our expert advisers. If you are unable to find the answer you need through our online resources, you can use the online chat facility to raise your question and an adviser will help. If they are unable to answer your query via chat, they may offer to call you back to discuss the matter further.

How does this approach support small businesses?

We are committed to making compliance with data protection law as easy as possible for small businesses, supporting them to get this right. We know small business owners spend their working weeks looking after their businesses and customers, leaving little time to devote to compliance issues. Our dedicated hub is packed with bite-sized information, tips and guides written with small organisations in mind. By investing more of our resources in online tools, we are investing in products and services that are available at any time of the day for time-pressed businesses.

What is happening to the staff who worked on this line?

The staff who worked on this phone line continue to work hard to answer questions from a wide range of organisations. They will be helping to develop our online tools and responding to enquiries via our live chat and callback service.

Business advice channel shift

Last updated: 11 September 2024

Important note – BAS staff have not yet been briefed on the changes and trade union engagement is ongoing. This information is **not for onward sharing**.

Contacts

Faye Spencer, Project lead
Suzanne Gordon, Project co-lead
[REDACTED], Project Manager

Background

From **1 October** there will be changes to the way the ICO provides advice to business customers.

These changes are necessary to redirect Business Advice Services (BAS) resource to where it is needed the most, which is primarily work to support data protection fee acquisition (payments and penalties).

Currently, callers to the ICO helpline (0303 123 1113) can choose from three options:

1. Data protection fee and registration advice
2. Advice for the organisation you work for
3. Member of the public

Option 2 will be removed and callers will be guided to the ICO website to start their enquiry through self-service.

A small number of additional case officers will be moved to the website's live chat. If a customer has a particularly technical enquiry, the chat agent will ask for their telephone number and make an outbound call to resolve their enquiry.

People with accessibility needs (for example, people unable go online) will be directed by recorded message [**awaiting detail**].

This approach will be tested for up to **three months** and feedback gathered to understand the customer experience and help improve it through iterative changes.

There is a contingency plan (TBC) that would turn the inbound call line back on (reinstate option 2) with a small team of call handlers. Promotion of self service would continue. This plan will be enacted if an unwieldy number calls was going to other ICO lines or feedback indicates that we aren't meeting our customer's needs.

Enhancing the online offer

The most common reasons for calling the helpline are for advice on:

- SARs

- Direct marketing
- Personal data breaches

BAS is working with DDaT to develop improved customer journeys on the website, including tools that will ask the customer questions to help them navigate through our guidance library. SARs guidance has been prioritised and will be ready for October (dates TBC). The tool will have a feedback mechanism so that user feedback can inform future iterations, and it will be developed for other topics post go live.

The contact us page on the website will be updated to reflect the move towards self-service.

Other tools we can bring in under the self-service banner include a new direct marketing click thinking tool that will give a clear answer on electronic marketing questions/practices (due for sign off at the start of October, Mary Jervis and Heather Turner leading) and the recently launched privacy notice generators.

BAS will also:

- Map out customer entry points to the ICO to address customers calling alternative numbers to try and reach business advice.
- Conduct an EQIA to ensure customers that need reasonable adjustments can still access services.
- Capture data on the number of business advice calls and why the customer didn't get the help they needed on the website.

Risks

- The changes are happening quickly and with little warning, which could leave businesses confused and frustrated.
- The changes are happening at a time when DSIT is proposing to increase the cost of the DP fee. The perception could be that the ICO is cutting services while putting up the cost of compliance.
- Other ICO phone numbers could be used as an alternative route for people seeking business advice, impacting other ICO services.
- Accessibility issues for people that cannot use online services and potentially excluding certain groups from being able to access and use a public service.
- Online services do not meet user need and prompt complaints or additional calls from frustrated customers, which could also be shared online and cause reputational damage.
- Do we let key stakeholders know in advance? Pros include being open and transparent about our direction of travel and maintaining positive relationships, cons are that we lose control of the message, could cause unnecessary concern in advance and appear to be abdicating responsibility for sharing the information with businesses and expecting stakeholder to do it, unless we take a proactive comms approach.

- Staff in BAS are currently unaware of the proposed changes (as at 11/9/24) which will see staff moved from phone support to other duties (which could include other elements of the helpline).

Some of these risks can be mitigated by taking a proactive approach to our external communications, others need further consideration by BAS.

Communications approach

Taking a proactive approach places us on the front foot and helps us to control the narrative and the message. It allows us to get ahead of any potential negative comments or reactions from businesses, stakeholders, media and those with an interest in the ICO's activities and maintain trust in the organisation.

Doing nothing before 1 October and only responding after the fact could look like we are trying to bring the changes in through the back door, which could undermine trust in the ICO and raise further questions about what we are likely to do/change in future.

Communications recommend a **proactive** approach.

Proactive approach

- Publish a statement on the ICO website, on the homepage in relevant sections, in the run up to 1 October [date TBC but would suggest the week before] announcing the date of the upcoming change, acknowledging that businesses may find the new system a step change but provide reassurance that the ICO is still here to help and provide a high quality service.
- Publish the statement on all of the ICO's social channels (excluding TikTok) and be prepared to respond to the questions that arise (eg why are you doing this, how do I contact you now, why are you increasing the DP fee but cutting your services etc).
- Agree a set of FAQs and lines to take about the changes and use these to answer questions on our channels or media enquiries.
- Develop an ongoing campaign that showcases the high quality online support that the ICO already offers and is launching (new SARs tool to navigate guidance, new direct marketing tool, privacy notice generators).
- What about stakeholder engagement? [also flagged in the outstanding questions below]

Alternative reactive approach

- Changes take effect on 1 October with contact us page updated on the website.
- Agree a set of FAQs and lines to take and use to answer questions as and when required.
- No stakeholder communication unless approached for comment.

- Develop an ongoing campaign that showcases the high quality online support that the ICO already offers and is launching (new SARs tool to navigate guidance, new direct marketing tool, privacy notice generators).

Internal comms

As at 11 September, BAS staff have not been informed of the proposed changes. Suzanne Gordon is leading on contact with the trade union and a plan is being developed to update staff and address their questions. Internal comms have not been engaged up until this point but the Internal Communications Business Partners have now been made aware.

Timeline

- XX September – agree scope of campaign to promote online self-service
- XX September – sign off of comms approach by Louise Lock and Faye Spencer
- XX September - sign off of key messages, FAQs and LTT
- XX September – direct comms to affected BAS staff
- XX September – post internal news story
- XX September – stakeholder comms??
- XX September - post statement on ICO website and social channels
- XX September – additional reminders of service changes on social media
- 1 October – go live of new recorded message removing option to speak to BAS
- XX October – launch of first iteration of campaign to promote online resources (new DM tool, improved SARs guidance – approach TBC)
- XX October – first set of feedback reviewed

Key messaging [TBC]

- These changes reflect the ICO's move towards a modern service that provides simple but comprehensive online tools that give businesses the certainty they need.
- We understand that this is a different approach, but directing our resources to improving our online tools and resources will give businesses instant access to the ICO's advice and expertise 24/7.
- We are committed to making compliance with data protection law as easy as possible for small businesses, supporting them to grow through the responsible use of information.

Gaps

- What further tools are coming online alongside SARs and direct marketing? What are the timeframes?

- Will we take a proactive approach to inform stakeholders such as FSB and CBI? Pros and cons, and will also depend on whether we take a proactive approach to our external comms.
- Will we publish the feedback gathered during this test period and our intended next steps? If asked via FOI we would probably release, so better to be transparent.
- How are we addressing accessibility issues? What if people cannot go online?
- What is the tipping point for the contingency plan to be enacted and the phone line reinstated?

DRAFT – requires BAS input and senior sign-off

Business Advice Line Q&A

Not for publication, these lines will be used:

- Consider responses to media and social media enquiries on a case-by-case basis by Comms
- To respond to questions from customers who contact BAS/ICO staff through the available ICO channels

Draft media/social responses must be signed off by: Faye Spencer tbc

NB: check against internal comms narrative for consistency

How can I get advice from the ICO?

There is lots of advice on our website, including practical written advice, video guides and interactive tools. Our guidance ranges from the comprehensive to the bite-sized, to cater for the different levels of support our customers need.

Why has the ICO closed the phone line for organisations?

Although we are encouraging more organisations to start their enquiry journeys online, this does not mean we are no longer providing phone support where it is needed. The ICO provides its expertise and support to businesses and other organisations in many different ways and the telephone helpline is a small part of our service. As a modern regulator, we know that businesses need access to high quality information around the clock. We already offer a wide range of simple but comprehensive online resources to help businesses get the answers they need, when they need them, and we will continue to develop these to meet our customers' needs. Where issues are particularly complex, our expert advisors will still be available to provide advice via livechat and where necessary, by phone.

The business advice line gets consistently good feedback. Why close it?

The ICO is modernising, and we understand that businesses want and expect to be able to access advice and support at any time. Modernising our service and investing in online tools, that provide simple but comprehensive help to get data protection right, will allow more organisations to begin their enquiry journeys online and get the certainty they need, when they need it. We are trialling this approach for three months and will review it at the end of that period.

Why are you doing this now?

In ICO25 we set out our intention to maximise our technical capability, to allow us realise the full benefits of digital tools to improve productivity, efficiency and the value we offer to fee payers and tax payers. By supporting more online customer journeys through providing extra online tools, more customers will be able to find the answers they need to the simpler questions they have, freeing up the time of our advisers to provide one-to-one advice on more complex matters.

What other changes will you be making? Will you be shutting your public helpline too?

There are no immediate plans to make any further changes to our helplines, but our services are always under review, to make sure we are providing the support our customers need as effectively and efficiently as we can.

Why are you putting up the DP fee up but cutting services?

The Department for Science, Innovation and Technology (DSIT) is responsible for setting the level of the data protection fee. Payment of the fee funds the ICO's work, which includes helping organisations of all sizes to comply with data protection law. The fee has remained static for a number of years and during this time the ICO has focused on providing value for money services and acting proportionately, but the current fee model no longer delivers the funding needed to achieve the ICO's objectives. We believe that the increase proposed in the consultation is proportionate and reasonable and will allow the ICO to continue to develop our offer to organisations.

This is the one reason I pay my DP fee. What do I get for my money now?

Our helplines are just one part of the service we provide to help organisations get data protection right. We provide a wide range of guidance, toolkits and resources, for large and small organisations, that help them make sense of data protection and save them time and money. Online services allow organisations to get an answer at any time of day and we are investing further in our online support to support customers. For example:

- We have launched a new Privacy Notice Generator, which provides small businesses with a bespoke privacy notice in just 15 minutes.
- Our new direct marketing tool will help small businesses quickly understand what they can and cannot do under the PECR legislation, helping them to safely grow their business.
- New SARs tool

I've been online and found an answer but I need clarification. How do I get it?

The ICO website includes an online chat facility. If you are unable to find the answer you need through our online guidance, you can use the online chat facility to raise your question and an advisor will help.

How do organisations contact the ICO if they are unable to go online?

We are committed to ensuring our services are inclusive and accessible for everyone. If you have accessibility needs that mean you are unable to use our website and live chat effectively, and you need a reasonable adjustment under the Equality Act 2010, please call our helpline number and select the relevant option.

I want to speak to a real person, how do I do that?

The ICO website includes an online chat facility. If you are unable to find the answer you need through our online tools, you can use the online chat facility to raise your question and an advisor will help. If they are unable to answer your query via chat, they may offer to call you back to discuss the matter further.

How does this approach support small businesses?

We know small business owners spend their working weeks looking after their businesses and customers, leaving little time to devote to compliance issues. By investing more of our resources in online tools, we are investing in products and services that are available at any time and whenever small businesses need them.

What is happening to the staff who worked on this line?

The staff who worked on this line continue to work hard to answer questions from a wide range of organisations, including through helping to develop our online tools and via our live chat and callback services.