

‘Looking ahead, staying ahead’

ICO plan 2014-17

**Version Final 2**

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Information Commissioner's Office

## Introduction

‘Looking ahead, staying ahead’



The Information Commissioner’s Office (ICO) is the UK’s independent authority supervising the legislation that upholds the rights of citizens and consumers in respect of information, whether safeguarding their personal information under the Data Protection Act or accessing official information under the Freedom of Information Act.

In this update of our three-year forward plan we’re looking ahead to stay ahead, addressing the challenges that face us so that we can remain an efficient and effective regulator, on top of our game and delivering for all our stakeholders. In response to changing circumstances we’re changing the way we do things in some areas of activity to make sure that we continue to make a difference.

Running through our plans for the next period are the 'five Es' that inspire our approach to upholding information rights.

- Educate
- Empower
- Enforce
- Enable
- Engage

In the following pages you'll find details of how we intend to

- Provide help and guidance to organisations and individuals
- Equip citizens and consumers to assert their information rights and to look after their personal information
- Be an effective but proportionate enforcer of information rights legislation
- Strike the right balance between openness and privacy, data protection and innovation
- Keep abreast of developments in technology, business and government so as to be able to give expert advice at the earliest stage

Over the past three years we've seen the ICO handling record numbers of cases. We've recorded more and more visitors to our website. We've dealt with a rising level of calls to our help line. Over the next three years we can expect a continued growth in the volume of business at the ICO; and the factors driving interest in information rights can only become more significant in the years ahead. How so? Use of digital services - at work, at home, in schools and colleges, and on the move - can only become even more prevalent. Alongside this growing dependence on information technology there's evidence of an increasing awareness and concern for privacy among consumers and citizens. The same awareness and concern, however, is not always demonstrated by data controllers, and every 'data breach' incident serves to highlight what still needs to be done to keep personal information private.

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Developments in technology and business such as Cloud computing or the so-called 'internet of things' (where devices and appliances interact with each other and, in effect, share customers' personal data) raise the stakes still higher, as do developments in policy such as the exploitation of Open Data or analysis of anonymised Big Data. Add to these the questions raised by the Snowden revelations of interception of communications data by security services and the ICO clearly still has a lot to do.

As well as the right to privacy, the ICO's business is also involved with the right to know - often balancing the two in the public interest. Again, we've seen record numbers of freedom of information applications to public authorities and of appeals to the ICO as the regulator. Again, judging by the numbers, there's no indication of any slackening in the public's appetite for freedom of information.

But the ICO's agenda is not just a question of responding effectively to rising case numbers. The nature of what we are expected to do is likely to change over the next three years. There's a drive to update the 20-year-old Data Protection Directive with a Regulation that could deliver greater consistency in data protection across the European Union. Even if the reform package is not completed this year, we expect the issue to be taken up by the newly installed EU Commission in the name of completing the digital single market. And finding multilateral answers to global challenges means dealing with data protection authorities across the globe, not just in Europe.

Following the General Election in May 2015 Parliament will need to review information rights in the UK. We expect to hear more about the Leveson proposals for data protection and the press, and a consultation on the 'burdens' that freedom of information obligations place on public authorities. At the same time, we'll be pressing for a new way of funding the ICO so that we no longer have to treat data protection and freedom of information as wholly separate activities, to be funded and accounted for separately, when in fact they are two sides of the same information rights coin.

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Last November we launched a public consultation about the future direction of the ICO – towards what we called a 2020 vision for information rights. The aim of ‘looking ahead, staying ahead’ remains a good description of the ICO’s approach over the next period.

Our plans for the next three years and beyond reflect the feedback we received from our stakeholders on the themes we’ve identified to link the way we deliver our plans. As we strive to uphold information rights in the public interest, we will aim to be

- Outcome focused, not process driven
- Agile, anticipating developments and demands
- Joined up, working as one ICO and working with other partners
- Efficient, making the most of available funding
- Expert, authoritative, and listened to
- Responsible, as a regulator, a business and an employer

In summary, the ICO is planning for even busier and more challenging times by adapting what we do and the way we do it in the interests of all our stakeholders.

**Christopher Graham**  
**Information Commissioner**

## Our goal, vision and mission

### **Mission**

The ICO's mission is to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

### **The ICO's goal is to achieve a society in which:**

All organisations which collect and use personal information do so responsibly, securely and fairly.

All public authorities are open and transparent, providing people with access to official information as a matter of course.

People are aware of their information rights and are confident in using them.

People understand how their personal information is used and are able to take steps to protect themselves from its misuse.

### **Our vision**

To be recognised by our stakeholders as the authoritative arbiter of information rights, delivering high-quality, relevant and timely outcomes, responsive and outward-looking in our approach, and with committed and high-performing staff – a model of good regulation and a great place to work and develop.

## Our strategic outcomes

To fulfil our mission and vision and to achieve our goals we have identified the following strategic outcomes:

- A high proportion of individuals with a basic awareness of their information rights, coupled with ready access to information on how to exercise those rights.
- Development of people's understanding of information rights and risks embedded as an output of the formal education system.
- Organisations routinely meeting their legal obligations in the way they respond to people exercising their rights.
- A high level of awareness in organisations of all their wider obligations under information rights law with those obligations routinely met in practice.
- Good information rights practice embedded into the culture and day-to-day processes of organisations and into emerging technologies and systems.
- Good information rights practice and the upholding of information rights being demonstrably driven by ICO's casework and secured and underpinned by the use of ICO's regulatory tools.
- Organisations and individuals aware of the ICO's investigatory and enforcement powers and the consequences of failing to meet the requirements of information rights law.
- A legislative framework for information rights that is integrated and consistent, underpins good information rights practice, furthers the upholding of information rights and enables the ICO to be an effective regulator.
- The law, technology and public policy developed and deployed consistently with ICO's goal, but without imposing disproportionate burdens on organisations.
- The public confident in information rights law as necessary, serving the public interest, effective in practice and properly enforced.

## Our 2014-17 corporate objectives

The ICO has identified the following six objectives, achievement against which will enable us to achieve our strategic outcomes.

1. Organisations have a better understanding of their information rights obligations.
2. Enforcement powers are used proportionately to ensure improved information rights compliance.
3. Customers receive a proportionate, fair and efficient response to their information rights concerns.
4. Individuals are empowered to use their information rights.
5. The ICO is alert and responsive to changes which impact on information rights.
6. An efficient ICO well prepared for the future.



## 1. Organisations better understand their information rights obligations

No	How we will achieve this	Measures	Due dates
1.1	Running a well-regarded helpline that provides practical and helpful advice to organisations; using staff committed to good customer service and focussed on customer needs.	<ul style="list-style-type: none"> <li>• Customer satisfaction rating over 90%</li> <li>• Anticipating 220k-250k calls:                             <ul style="list-style-type: none"> <li>○ answer at least 95% of calls</li> <li>○ average customer wait to speak to an adviser no more than 60 seconds</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Next survey 2014</li> <li>• Quarterly reporting</li> </ul>
1.2	Providing a timely and pragmatic written advice service that provides workable solutions and steers organisations to the website for future enquiries.	<ul style="list-style-type: none"> <li>• 90% answered in 30 days</li> <li>• Future reduction in contacts</li> </ul>	<ul style="list-style-type: none"> <li>• Quarterly reporting</li> <li>• Comparative figures to be produced based on statistics from the ICO and others by Sept 2014</li> </ul>
1.3	Providing a website that helps organisations find the guidance they need and promotes self-education and transactional services; eg enabling organisations to maintain their data protection register entry on-line.	New site launched	Sept 2014

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No	How we will achieve this	Measures	Due dates
1.4	Action deleted 20 October 2014 as no longer relevant.		
1.5	Broadening our communications channels to better raise awareness of information rights across a greater proportion of the UK and reach more deeply into niche professional markets.	<ul style="list-style-type: none"> <li>Analyse stakeholder perception study &amp; annual track survey</li> <li>Implement recommendations</li> </ul>	<ul style="list-style-type: none"> <li>Jun 2014</li> <li>Jun 2015</li> <li>Jun 2016</li> <li>Dec 2014</li> <li>Dec 2015</li> <li>Dec 2016</li> </ul>
1.6	Developing and implementing media strategies aimed at organisations; to highlight information rights issues and publicise good practice.	Annual Track Survey	Ongoing through to Mar 2017
1.7	Highlighting best practice and following up on improvement activity by sharing recommendations from our audit programme.	<ul style="list-style-type: none"> <li>Annual Track survey</li> <li>Surveys of those audited</li> </ul>	<ul style="list-style-type: none"> <li>As per the schedule for this research</li> <li>Next report to be published Sept 2014</li> </ul>
1.8	Promoting the benefits of the information rights concepts of privacy by design, data minimisation, privacy impact assessments and accountability.	<ul style="list-style-type: none"> <li>Data protection audit findings</li> <li>Meeting of targets in Strategic Liaison plan</li> </ul>	<ul style="list-style-type: none"> <li>Ad-hoc publication of outcomes on the website</li> <li>Progress against plan reviewed Aug 2014 Dec 2014 Apr 2015</li> </ul>

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No	How we will achieve this	Measures	Due dates
1.9	Developing and promoting accreditation, trust mark and seal schemes as a means of building the commitment of organisations to good data protection practice.	<ul style="list-style-type: none"> <li>• Framework for ICO sponsored pathfinder scheme in place</li> <li>• Pathfinder scheme in operation</li> </ul>	<ul style="list-style-type: none"> <li>• Mar 2015</li> <li>• 2016</li> </ul>
1.10	Developing codes of practice that address specific issues and ensuring existing guidance is up to date and relevant.	<ul style="list-style-type: none"> <li>• New guidance on data protection &amp; the press</li> <li>• DPA/FOIA/EIR guidance updates</li> </ul>	<ul style="list-style-type: none"> <li>• June 2015</li> <li>• Ongoing</li> </ul>
1.11	Publishing more information about complaint outcomes to better inform individuals and organisations as to what is being done to meet common concerns.	<ul style="list-style-type: none"> <li>• Effective and efficient capture and interpretation of information</li> <li>• Publication of outcomes</li> <li>• Quarterly activity reports</li> </ul>	<ul style="list-style-type: none"> <li>• Web content developed Q1 and Q2 2014/15</li> <li>• Half yearly progress report in Oct 2014</li> </ul>

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No	How we will achieve this	Measures	Due dates
1.12	Targeting areas of greatest information rights risk and focusing guidance and advice on these areas		
	<ul style="list-style-type: none"> <li>Running information rights initiatives targeted at high risk areas; highlighting concerns and improving information rights practice.</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder survey</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing through to Mar 2017</li> </ul>
	<ul style="list-style-type: none"> <li>Prioritising areas of highest information rights risk and implementing action plans to address these risks; including closer liaison with relevant organisations.</li> </ul>	<ul style="list-style-type: none"> <li>Reviewing priority areas</li> <li>Priority Action Group reports</li> <li>Fewer complaints in priority areas</li> </ul>	<ul style="list-style-type: none"> <li>Half yearly at IRC</li> <li>Half yearly at IRC</li> <li>Ongoing</li> </ul>
	<ul style="list-style-type: none"> <li>Providing guidance to major stakeholders on ongoing activities and new initiatives which raise substantial information rights concerns.</li> </ul>	<ul style="list-style-type: none"> <li>Meeting of targets in Strategic Liaison plan</li> <li>Stakeholder perception study</li> </ul>	<ul style="list-style-type: none"> <li>Progress against plan reviewed Aug 2014 Dec 2014 Apr 2015</li> </ul>
	<ul style="list-style-type: none"> <li>Raising information rights awareness in Northern Ireland, Scotland and Wales in ways which recognise the particular local context.</li> </ul>	<ul style="list-style-type: none"> <li>Meeting of targets in the NI, Scotland and Wales plans</li> </ul>	<ul style="list-style-type: none"> <li>Progress reviewed quarterly.</li> </ul>
1.13	Respond to legislative proposals which extend or impact on information rights.	<ul style="list-style-type: none"> <li>Mini project plans for specific proposals</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing</li> </ul>
	Providing guidance to stakeholders on such changes.	<ul style="list-style-type: none"> <li>Timeliness in implementation</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing</li> </ul>

**2. Enforcement powers are used proportionately to ensure improved information rights compliance**

	How we will achieve this	Measures	Due dates
2.1	Improving the compliance of organisations by issuing civil monetary penalties for serious breaches of the Data Protection Act.	<ul style="list-style-type: none"> <li>• Develop an on-line self-reporting breach tool</li> <li>• Effective tasking and coordination leading to enforcement</li> <li>• No of CMPs issued</li> <li>• Research on maximising effectiveness of penalties completed and results implemented</li> </ul>	<ul style="list-style-type: none"> <li>• Completed by end Q1 2014/15</li> <li>• Completed by end June 2014; implemented by end Sept 2014</li> </ul>
2.2	Investigating and prosecuting those who commit criminal offences under the Data Protection and Freedom of Information Acts, liaising with other investigative and prosecuting authorities as appropriate.	<ul style="list-style-type: none"> <li>• Reactive investigations into S55 DPA and S77 FOIA offences</li> <li>• Conduct initiatives with other regulators and prosecuting authorities</li> <li>• Prosecute and administer cautions where appropriate</li> </ul>	Quarterly reporting of outcomes

	How we will achieve this	Measures	Due dates
		<ul style="list-style-type: none"> <li>no of convictions v prosecutions</li> </ul>	
2.3	Using other data protection enforcement powers effectively		
	<ul style="list-style-type: none"> <li>Using our enforcement notice power where there is significant risk to information rights and this is the most appropriate way of ensuring compliance.</li> </ul>	<ul style="list-style-type: none"> <li>No of enforcement notices issued</li> <li>No of appeals against outcomes and successful outcomes</li> </ul>	Half yearly progress report in Oct 2014
	<ul style="list-style-type: none"> <li>Obtaining formal undertakings when improvements to information rights practices are required and this is the most appropriate way of ensuring compliance. Ensuring actions required are undertaken.</li> </ul>	<ul style="list-style-type: none"> <li>No of undertakings obtained</li> <li>Quarterly public facing activity reports</li> </ul>	Half yearly progress report in Oct 2014
	<ul style="list-style-type: none"> <li>Encouraging organisations to sign up to improvement plans which address information rights compliance issues, backed up by formal action when needed.</li> </ul>	<ul style="list-style-type: none"> <li>Targeting of follow-ups</li> <li>Review effectiveness of plans</li> <li>90% of recommendations actioned</li> </ul>	Half yearly progress report in Oct 2014

	How we will achieve this	Measures	Due dates
2.4	Enforcing the Privacy and Electronic Communications Regulations (in particular relating to nuisance calls, SPAM texts and cookies) in a proportionate and effective way.	<ul style="list-style-type: none"> <li>• No of CMPs and enforcement notices issued</li> <li>• Report on compliance improvements</li> <li>• Fewer complaints to TPS about those we have acted against</li> <li>• Fewer complaints to the ICO</li> </ul>	Half yearly progress report in Oct 2014
2.5	Monitoring how quickly public authorities respond to freedom of information requests and addressing poor performance.	<ul style="list-style-type: none"> <li>• Publication of quarterly reports</li> <li>• Annual report outlining monitoring effectiveness</li> </ul>	Reviews at the end of each monitoring period and report at end Q4 2014/15
2.6	Monitoring how quickly data controllers respond to subject access requests. Following the approach to enforcement set out in our code of practice and addressing poor performance.	<ul style="list-style-type: none"> <li>• Introducing a monitoring process</li> <li>• Assessing effectiveness of monitoring</li> <li>• Developing code of practice</li> </ul>	End Q4 2014/15

### 3. Customers receive a proportionate, fair and efficient response to their information rights concerns

	How we will achieve this	Measures	Due dates
3.1	Providing an efficient and timely data protection complaints handling service that uses public concerns to identify areas of improvement for organisations.	<ul style="list-style-type: none"> <li>To keep pace with intake – 90% of cases closed in 6 months</li> <li>Benchmarking against other regulators</li> <li>Customer satisfaction survey</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly report</li> <li>Quarterly report</li> <li>Quarterly report</li> </ul>
3.2	Providing a freedom of information complaints handling service that makes proportionate and timely decisions.	To keep pace with intake – 90% of cases closed in 6 months	Quarterly report
3.3	Providing a simple mechanism that enables the public to register their concerns about breaches of the Privacy and Electronic Communications Regulations.	<ul style="list-style-type: none"> <li>Number of referrals</li> <li>Customer/ consumer champions feedback</li> </ul>	Quarterly report
3.4	Responding to appeals against our freedom of information decision notices in a proportionate and efficient way.	<ul style="list-style-type: none"> <li>Cost per appeal</li> <li>No. &amp; % of cases resolved in-house</li> <li>No. &amp; % of cases where counsel instructed</li> <li>No. &amp; % of oral hearings attended</li> </ul>	<ul style="list-style-type: none"> <li>Monthly</li> <li>Monthly</li> <li>Monthly</li> <li>Monthly</li> </ul>



**4. Individuals are empowered to use their information rights.**

	How we will achieve this	Measures	Due dates
4.1	Promoting to the public how transparency initiatives, proactive disclosure and publication schemes are useful in a democratic society.	<ul style="list-style-type: none"> <li>• Blogs</li> <li>• Written articles</li> <li>• Press interviews</li> <li>• Speaking engagements</li> <li>• Annual Report</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing</li> <li>• Ongoing</li> <li>• Ongoing</li> <li>• Ongoing</li> <li>• Ongoing</li> </ul>
4.2	Working with organisations to maximise the impact of guidance on how individuals can protect themselves against information rights risks.	<ul style="list-style-type: none"> <li>• Strategic Liaison meetings</li> <li>• Speaking engagements</li> <li>• No. and nature of complaints and enquiries</li> <li>• Guidance on press right to obtain and use personal data</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing</li> <li>• Ongoing</li> <li>• Ongoing</li> <li>• Ongoing</li> </ul>
4.3	Better understanding public concerns about information rights by working with civil society and other groups representative of those affected by information rights issues and by using our own research.	<ul style="list-style-type: none"> <li>• Six meetings with such groups as in Strategic Liaison plan</li> <li>• Annual track survey</li> </ul>	<ul style="list-style-type: none"> <li>• Progress against plan reviewed Aug 2014 Dec 2014 April 2015</li> <li>• Oct 2014</li> </ul>

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	How we will achieve this	Measures	Due dates
4.4	Developing material for teachers and working within the education system to embed information rights awareness in the curriculum.	<ul style="list-style-type: none"> <li>• Two new lesson plans</li> <li>• Follow up research</li> </ul>	<ul style="list-style-type: none"> <li>• Sept 2014</li> <li>• 2015</li> </ul>
4.5	Extending the ICO's reach into all parts of the country and sections of society to achieve equality of access to information rights and our services.	Report on progress in key equalities initiatives in Annual Report	July 2014 July 2015 July 2016
4.6	Running a well-regarded helpline that provides practical and helpful advice to the public.	<ul style="list-style-type: none"> <li>• Keep (public) customer satisfaction rating over 90%</li> <li>• Anticipating 220k-250k calls:               <ul style="list-style-type: none"> <li>○ answer at least 95% of calls</li> <li>○ callers wait on average no more than 60 seconds to speak to an adviser</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Next survey 2014</li> <li>• Quarterly reporting</li> </ul>
4.7	Publishing more information about complaint outcomes to better inform individuals and organisations as to what is being done to meet common concerns.	Improved website content	Half yearly progress report Oct 2014

**5. The ICO is alert and responsive to changes which impact on information rights**

	How we will achieve this	Measures	Due dates
5.1	Working with the Ministry of Justice (MOJ), Article 29 Working Party and others to help shape the future European Union data protection framework so that it delivers practical and enforceable rights for citizens and relevant and proportionate obligations for businesses and the regulator.	<ul style="list-style-type: none"> <li>• Significant input to the Article 29 Working Party</li> <li>• International contribution to information rights report to IRC and MB</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing</li> <li>• Apr 2014</li> <li>• July 2014</li> <li>• Nov 2014</li> <li>• Jan 2015</li> </ul>
5.2	Responding to and engaging with Government proposals for freedom of information reform following the Justice Committee’s post legislative scrutiny.	Revised legislation, Secretary of State codes of practice and government guidance reflect ICO views	Following Parliamentary and Government timetables
5.3	Engaging with public policy initiatives across the board to make sure they reflect and respect information rights.	<ul style="list-style-type: none"> <li>• Relevant consultations identified and responded to</li> <li>• Initiatives covered by Strategic Liaison and Policy Delivery plans with targets established and met</li> </ul>	<ul style="list-style-type: none"> <li>• In line with consultation timetables</li> <li>• Progress against plan reviewed Aug 2014 Dec 2014 April 2015</li> <li>• Quarterly information rights reports to IRC and MB</li> </ul>

	How we will achieve this	Measures	Due dates
5.4	Engaging with transparency and Open Data initiatives to ensure a balanced information rights perspective, and responding to specific legislative or good practice measures.	<ul style="list-style-type: none"> <li>• Meeting targets set in Strategic Liaison plan</li> <li>• Opportunities taken to influence and convey ICO views</li> <li>• ICO views reflected in Transparency Board, Open Data Institute and other bodies' outputs</li> </ul>	<ul style="list-style-type: none"> <li>• Progress against plan reviewed Aug 2014 Dec 2014 April 2015</li> </ul>
5.5	Engaging with the Government and press industry follow the Leveson report, in particular with the proposals for changes in data protection legislation and the governance of the ICO. Issuing ICO guidance on data protection and the media. Developing and implementing an action plan to promote guidance.	<ul style="list-style-type: none"> <li>• Guidance issued. Progress in promoting in accordance with action plan</li> <li>• Successfully spotting and responding to opportunities to influence developments in line with ICO strategy</li> </ul>	<ul style="list-style-type: none"> <li>• July 2014 in line with targets in the action plan</li> <li>• Ongoing</li> </ul>
5.6	Liaising with, providing evidence for and reporting as necessary to the Westminster Parliament, the Scottish Parliament and the devolved assemblies.	<ul style="list-style-type: none"> <li>• Identify threats &amp; opportunities</li> <li>• Evidence submitted</li> </ul>	<ul style="list-style-type: none"> <li>• Specified deadlines met</li> </ul>

	How we will achieve this	Measures	Due dates
5.7	Keeping alert to responding proportionately to and using our powers and influence appropriately to address the growth in surveillance and the need to reassess safeguards and oversight.	<ul style="list-style-type: none"> <li>Engagement with Intelligence &amp; Security Committee and other Parliamentary committees</li> <li>Meeting of targets in Strategic Liaison plan</li> </ul>	<ul style="list-style-type: none"> <li>In accordance with committee timetable and deadlines</li> <li>Progress against plan reviewed Aug 2014 Dec 2014 Apr 2015</li> </ul>
5.8	Working with the Scottish Information Commissioner to ensure a joined-up approach to information rights issues so far as is consistent with the independence and functions of our respective office.	Joint or jointly-badged guidance and joint presentations to conferences	Regular scheduled meetings
5.9	Working for greater consistency and coordination in the investigation and enforcement of global data protection issues.	<ul style="list-style-type: none"> <li>IECWG annual event successfully hosted</li> <li>Sentinel information sharing website established</li> <li>Participating in international privacy initiatives</li> </ul>	<ul style="list-style-type: none"> <li>Apr 2014</li> <li>Nov 2014</li> <li>Ongoing</li> </ul>
5.10	Developing our ability to understand and respond to technological developments and to build this into all aspects of our information rights work.	<ul style="list-style-type: none"> <li>Outputs from internet and mobile services priority action group</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing</li> </ul>

	How we will achieve this	Measures	Due dates
		<ul style="list-style-type: none"> <li>Technology Reference Panel to meet twice</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing</li> </ul>
5.11	Implementing a research strategy addressing the information rights agenda.	Research projects to deliver on time and within budget	Timescales set for each research project or initiative
5.12	Ensuring that data sharing develops in a way that respects information rights without data protection being seen as a barrier to proportionate and beneficial data sharing.	Establishing and implementation of agreed cross-office action plan	In accordance with the plan
5.13	Pressing the case for an extension of our assessment notice power to enable us to do compulsory audits when justified.	<ul style="list-style-type: none"> <li>Legislation to implement extension to NHS bodies laid before Parliament</li> <li>Taking opportunities to make the case for further extension; eg in relation to data sharing</li> </ul>	<ul style="list-style-type: none"> <li>May 2014</li> <li>Ongoing – dependant on opportunities and timetables of others</li> </ul>
5.14	Continuing to encourage the Government to activate legislation to allow courts to consider penalties (such as community service orders or the threat of prison) for the unlawful trade in personal information and outlaw the practice of enforced subject access.	<ul style="list-style-type: none"> <li>Liaison with the MOJ and other relevant departments</li> </ul>	Ongoing

## 6. An efficient ICO well prepared for the future

	How we will achieve this	Measures	Due dates
6.1	<p>Preparing for substantial change involving:</p> <ul style="list-style-type: none"> <li>• implementing a new EU legal framework for data protection and</li> <li>• post legislative scrutiny of freedom of information</li> <li>• additional statutory responsibilities (eg the Enterprise and Regulatory Reform Act 2013 – MiData).</li> </ul>	Review developments and take appropriate steps	Ongoing
6.2	Working with the MOJ to define future funding arrangements that recognise the interrelation of freedom of information and data protection work and which ensure the long-term stability of the ICO’s financial model: to be formulated as draft legislation for the next Parliament.	Providing appropriate and timely input into MOJ work; aiming for funding proposals that ensure the long-term stability of the ICO’s financial model to be ready by end 2014/15.	Dec 2014
6.3	Improving efficiency particularly in Corporate Support functions, purchasing & third party contracts.	Planning and budgeting for 2015/16 and beyond	Mar 2015 Mar 2016 Mar 2017
6.4	Implementing our IT strategy		
	<ul style="list-style-type: none"> <li>• Business functionality: Complete online registration software development; build new online transactions including self reported breaches and reporting of concerns.</li> </ul>	Business requirements complete	Mar 2015

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	How we will achieve this	Measures	Due dates
	<ul style="list-style-type: none"> <li>Keeping IT up to date: Replace end of life firewalls; select replacement software for electronic documents record management; migrate electronic documents to new software; plan replacement of casework system.</li> </ul>	<ul style="list-style-type: none"> <li>Firewall replaced</li> <li>50% of documents migrated to new software.</li> </ul>	<ul style="list-style-type: none"> <li>July 2014</li> <li>Mar 2015</li> </ul>
	<ul style="list-style-type: none"> <li>Expand ICE registration database to create a stakeholder database with office wide access.</li> </ul>	Business requirements complete	Mar 2015
	<ul style="list-style-type: none"> <li>Update our casework management system software with a gradual move to new functionality and our CRM software.</li> </ul>	Business requirements complete	Requirements incorporated into IT strategy
6.5	Building on current training and development so we can add value and deliver business outputs.	Evaluation of learning & development activity	Mar 2015 Mar 2016 Mar 2017
6.6	Engaging with staff to ensure input into and understanding of the ICO's corporate evolution and the need to respond to change with agility and flexibility.	Engagement measures in staff surveys	Mar 2015 Mar 2016 Mar 2017
6.7	Embedding diversity and our values so that they are an everyday part of how we work and decision making.	Staff survey and performance and development reviews	Mar 2015 Mar 2016 Mar 2017
6.8	Implementing the knowledge management strategy so that business knowledge is captured, shared and used to facilitate sharing of information and a single consistent and comprehensive customer view.	<ul style="list-style-type: none"> <li>Knowledge management assessment</li> <li>Implementation plan</li> </ul>	<ul style="list-style-type: none"> <li>Jun 2014</li> <li>Dec 2014</li> </ul>



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	How we will achieve this	Measures	Due dates
6.9	Reviewing and improving our corporate governance and compliance with information rights legislation:		
	<ul style="list-style-type: none"> <li>Maintaining performance in responding to increased numbers of information requests.</li> </ul>	95% of requests within statutory deadlines	<ul style="list-style-type: none"> <li>Mar 2015</li> <li>Mar 2016</li> <li>Mar 2017</li> </ul>
	<ul style="list-style-type: none"> <li>Identifying and acting upon opportunities to proactively disclose information.</li> </ul>	Analysis of requests and increased proactive disclosure	<ul style="list-style-type: none"> <li>Mar 2015</li> <li>Mar 2016</li> <li>Mar 2017</li> </ul>
	<ul style="list-style-type: none"> <li>Continuing to embed good information handling behaviours across the ICO.</li> </ul>	<ul style="list-style-type: none"> <li>Refreshed awareness programme</li> <li>monitoring results</li> </ul>	<ul style="list-style-type: none"> <li>Mar 2015</li> <li>Mar 2016</li> </ul>
	<ul style="list-style-type: none"> <li>Implementing an ICO internal assurance framework</li> </ul>	<ul style="list-style-type: none"> <li>Framework in place</li> </ul>	<ul style="list-style-type: none"> <li>April 2014</li> </ul>
6.10	Having regard to the Regulators' Code when developing policies and operational procedures that guide the ICO's regulatory activities.	<ul style="list-style-type: none"> <li>Assessment of practice against the Code's requirements</li> <li>Required actions taken</li> </ul>	<ul style="list-style-type: none"> <li>Apr 2014</li> <li>In accordance with the agreed plan</li> </ul>
6.11	Contributing to Government targets on sustainability.	Per head year on year reduction in greenhouse gas emissions	Report on performance in Annual Reports
6.12	Examining ways of using the flexibility we have to charge for certain services; to allow the ICO to provide services which aid compliance but which it might not otherwise be able to afford.	<ul style="list-style-type: none"> <li>Approach agreed with MOJ</li> </ul>	<ul style="list-style-type: none"> <li>Jun 2014</li> </ul>

## Our values

**We will support delivery of our corporate plan by living our values. We are:**

- **Committed**  
We care about upholding information rights.
- **Team workers**  
We work together as one ICO team, sharing information and expertise.
- **Focused**  
We give priority to activities that make the biggest contribution to achieving our mission.
- **Effective**  
We work to produce high quality and timely outcomes.
- **A model of best practice**  
We do not ask others to do what we are not prepared to do ourselves.
- **Alert**  
We are alert to the views and needs of our stakeholders and to the potential impact of new developments.
- **Fair**  
We treat everybody we deal with fairly and with integrity and respect. We are inclusive in our approach.
- **Always learning**  
We are always learning and developing professionally.