

# Stakeholder Perceptions 2012

Prepared for the Information  
Commissioner's Office

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# **Executive summary**

# Executive summary

## Introduction

The Information Commissioner's Office (ICO) commissioned Ipsos MORI to conduct research among key stakeholders to measure perceptions of the ICO and its performance. The research comprised two elements: a quantitative telephone survey with 58 stakeholders and qualitative depth interviews with 13 stakeholders. Fieldwork for this research took place between 13 December 2011 and 7 February 2012.

This report combines the findings from both elements of the research; the key findings of which are summarised below.

## Overview

It is clear from this research that the ICO is valued by stakeholders:

- Most are advocates and believe the ICO has a real and valuable role to play in ensuring the success of their organisations.
- The ICO stands out from other regulators in adopting a more pragmatic approach to enforcement, and this is a much valued aspect of stakeholders' relationship with the ICO. However, this stance is not without its issues which are acknowledged by stakeholders, namely the difficult act of balancing the advisory and enforcement roles.
- While stakeholders perceive the direct benefits of being able to get quick and informal answers to queries and the ICO's willingness to take the time to learn about their organisations they do feel that the ICO needs to fulfil its enforcement role more. Put simply they feel that the ICO needs to publicise its enforcement actions more – to be seen to be acting as an enforcer by being more public about actions they take against those organisations which do not comply with legislation.

Hence, looking back to the ICO's vision ("by 2012 we will be recognised by our stakeholders as the authoritative arbiter of information rights") gives a mixed message. The ICO is seen as an effective arbiter in providing advice and guidance on information rights. However stakeholders also see an inherent conflict between this advisory role and the ICO's duty as a regulator, which is seen to constrain the ICO in both its roles.

The wish for the ICO to be more public about the enforcement (authoritative) side of its role, extends outside the UK. Stakeholders see a role for the ICO as the champion of UK information rights compliance in Europe – publicising the high level and standard of compliance in the UK. They see a further role in reinforcing these messages with examples of good practice to showcase both current UK thinking and provide good working guidelines for organisations to follow.

The two most mentioned areas for improvement would involve fundamental change to both the ICO's role and information rights legislation but are perceived to offer immediate and valuable benefits to stakeholders. Specifically, these are:

- The move towards a more precedent-based structure in information rights decisions – this is seen to offer the perceived benefit to stakeholders of reducing the amount of inconsistency in the decisions and advice given by the ICO and also reducing the burden on themselves of compliance with the legislation. It is also seen to reduce the ambiguity

of the ICO's role as a regulator and advisor – allowing the ICO to take a clearer stance on specific issues.

- Likewise the desire for speedier advice and guidance on emerging areas of technology offers stakeholders the benefit of having some guidance in how to implement required changes within their organisation, without the need to review their procedures again once formal guidance is issued. Some stakeholders are willing to trade a definitive answer (at a later date) for “first thoughts” guidance (at an early date) to allow them to work from agreed principles when developing their internal procedures. Hence from the stakeholders' perspective it would be feasible for the ICO to speak informally about the issues while formulating opinions and practices which will be incorporated into formal guidance later.

## Contact with the ICO

There is clearly an established and valued contact structure in place for key stakeholders – most have one senior member of ICO staff as their designated contact and contact at this level is seen to be good.

Stakeholders feel able to contact the ICO as and when they need to – to seek guidance on specific issues or to raise concerns. They clearly appreciate this ability to call on expert knowledge from ICO staff when needing a “sounding board” to discuss areas of uncertainty.

## Feeling informed

Two-thirds of respondents feel they are kept informed by the ICO, although there is a feeling that the ICO could be communicating more with stakeholders. Among telephone survey respondents, the ICO's website is the main information source and a preferred source for most respondents, however there are issues around the usability of the search function and the relevancy of some of the information stored on it.

There is clearly an appetite for more communication with the ICO, but the established pattern of stakeholders contacting the ICO when they need to seems to be working well.

## Working relationship with the ICO

The ICO clearly has very good relationships with stakeholders, being seen to work in a collaborative manner and acknowledging the expertise of their stakeholders. The seniority of their designated contacts is valued, providing gravitas to advice given and reassuring stakeholders that when they are signposted to other members of ICO staff their enquiries will be handled well. Relationships are generally seen to have either improved or stayed the same and stakeholders overall have very positive perceptions of the ICO staff they contact.

The main criticism is the lack of consistency in information and advice given on specific topics. Experiences of more junior staff, essentially the complaint case worker level, are less good. The issues for stakeholders are twofold:

- new case workers are perceived to lack knowledge of the client and established working practices; and
- inconsistencies in the advice given by different individuals on the same point of compliance.

However, for most stakeholders this is not seen as being a major problem, more a niggle or an irritation rather than an issue. For those depth interview participants who mention this as an issue better internal ICO communications for staff at this level about the stakeholder's organisation and sector are seen as a solution.

## Advocacy of the ICO

It is clear that the ICO is seen as both important to the success of stakeholders' organisations and also influential in the way information rights law is applied in their organisations. The majority of stakeholders are advocates of the ICO, with a minority being neutral and fewer than one in ten being critics.

The main factors resulting in negative views are inconsistency in information, advice and guidance and a perception that the ICO is not taking a proactive enough role.

## Effectiveness of the ICO

The ICO is seen as effective in helping organisations to meet their legal obligations around information rights and embedding good information rights practice in their culture and processes.

In both the depth interviews and the telephone survey nearly all feel that the ICO is either more effective now than a year ago (four in ten among the telephone survey participants) or is as effective as a year ago (half of the telephone survey participants). What they value the most about the ICO and what they are most likely to mention as in need of improvement can be jointly summarised as the quality of support and guidance provided and the overall relationships which the ICO has with stakeholders.

## The ICO's advisory role

Generally, participants feel that the ICO is effective in its role as an advisor and in offering guidance on existing information rights practice. It is with regard to emerging technologies where the ICO is seen as less effective, with stakeholders expressing a wish for speedier advice to be provided in this area.

## The ICO's enforcement role

Overall, the ICO is seen as an effective regulator, demonstrating impartiality and proportionality in its decisions. However, enforcement is one area where participants in both elements of the research would like to see the ICO take a more active role – or at least to publicise their actions more.

## Confidence in achievement of the ICO's stated goals

Overall there is measured confidence in the ICO's ability to achieve its stated goals<sup>1</sup>: although very few stakeholders say they are not confident, the majority of stakeholders are *fairly* confident rather than *very* confident.

Respondents believe that the ICO is most likely to achieve its goal to ensure "people understand how their personal information is used and are able to take steps to protect themselves from its misuse". Respondents are less convinced that the ICO will succeed in the other stated goals.

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<sup>1</sup> The stated goals are:

- All organisations which collect and use personal information to 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



# Background

Interviews took place between 13 December 2011 and 19 January 2012. Contacts were sent an email before fieldwork began introducing the survey and explaining that Ipsos MORI would be contacting them. Each interview lasted approximately 25 minutes and followed the same structured questionnaire. A copy of the questionnaire can be found in the appendices.

## Methodology – depth interviews

Depth interviews were conducted with 13 key stakeholders, specified by the ICO. Contact details were provided by the ICO. Each depth interview lasted c.30 minutes and followed the same discussion guide, a copy of which can be found in the appendices. The depth interviews took place between 16<sup>th</sup> January and 7<sup>th</sup> February 2012.

As with the telephone interviews, each contact was sent an email by the ICO introducing the survey and explaining that Ipsos MORI would be contacting them.

## Interpretation of the results

This report combines the results of the two elements of the study: the quantitative telephone survey and the qualitative depth interviews.

### Telephone survey

This element comprises 58 interviews conducted with key stakeholders of the ICO: 34 of the interviews were with stakeholder contacts provided by the implementation team; 24 with contacts from the complaints team.

**Table 1: ICO stakeholder classification by self-reported role**

	ICO classification	
	Complaint strand	Implementation strand
<i>Base: All respondents to the telephone survey (58)</i>	(24)	(34)
<b>S1. Stakeholder's self-reported role:</b>		
Policy development/implementation role only (19 respondents)	2	17
Complaints role only (1)	1	0
Dual role (38)	21	17

*Source: Ipsos MORI*

Half of the respondents classified by the ICO as belonging to the implementation strand say that their role is wholly associated with policy development or implementation; half say that they also handle complaints. Nearly all of the respondents within the complaints strand say that their responsibilities cover both implementation and complaint resolution (referred to as "dual role" stakeholders in the report). For those with dual roles, four in ten say that not much of their time is spent on complaint resolution. For one respondent in the complaint strand

their role is solely complaint resolution and two say their role is only around implementation of information rights law.

There are many differences in perceptions between those who say their role is implementation only and those who say they have a dual role. Therefore analysis in this report uses respondents' stated role as the basis of comparison between different types of stakeholders, rather than using the classification provided by the ICO. Hence where the views of implementation stakeholders are commented on this is a group of 19 respondents, and where dual role stakeholders are commented on this is a group of 38 respondents.

It should be noted, that with the small sample sizes in this research, the noted differences are indicative rather than definitive.

### Depth interviews

This element comprises 13 depth interviews conducted with a range of key stakeholders. Again these stakeholders have a range of implementation, policy development and complaint resolution roles. Three participants came from the ICO's complaints strand and ten from the implementation strand.

### Analysis by different groups within the stakeholders

We have not made direct comparisons between the views of **public and private sector organisations** in the report due to insufficient sample sizes. In the telephone survey there are six organisations classified as "business and industry"; and three depth interviews were conducted with private sector stakeholders. However, where there are consistent comments in the depth interviews across the private sector stakeholders which differ from public sector stakeholders these have been highlighted in the report.

It is not possible to analyse the results of the telephone survey by whether the stakeholder is responsible for **data protection or freedom of information issues** since this was not asked within the interview.

This question was also not asked during the depth interviews, but in this environment it was possible to probe to establish to which field the participant's comments were related. What is clear from our analysis is that seven depth interviews were conducted with stakeholders responsible only for data protection issues, one with a stakeholder responsible only for freedom of information issues and five with stakeholders who were responsible for both fields.

## Analysis and reporting

This report draws together the findings from both elements of the survey – with the qualitative findings helping to illustrate the quantitative findings and the quantitative findings providing context for the qualitative findings.

The quantitative data in this report is unweighted. Because of the small base size the results are indicative only. While percentages are included in this report they should be treated with caution because of the small base sizes. It is for this reason that much of the commentary refers to fractions rather than the actual percentages. A full breakdown of the quantitative results can be found in the appendices.

All participants in this research were given the option for their responses to be attributed or not to their organisation. While most are happy for their comments to be attributed, some

participants are not. It is for this reason that some quotes are attributed only by the research element and stakeholder type/role rather than to a specific organisation.

## Publication of data

As with all our studies, findings from this survey are subject to our Standard Terms and Conditions of Contract. Any press release or publication of the findings of this survey requires the advance approval of Ipsos MORI North. Such approval will only be refused on the grounds of inaccuracy or misrepresentation.

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# Perceptions of the ICO

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## Contact with the ICO

### Summary

There is clearly an established and valued contact structure in place for key stakeholders – most have one senior member of ICO staff as their designated contact and contact at this level is seen to be good.

**It has certainly improved latterly because they've come up with this new approach of having a single point-of-contact ... that's been welcomed because obviously sometimes navigating as to who to go to can be a bit of an issue.**

*Depth interview, implementation strand*

Stakeholders feel able to contact the ICO as and when they need to – to seek guidance on specific issues (for example vexatious FOI requests) or to raise concerns.

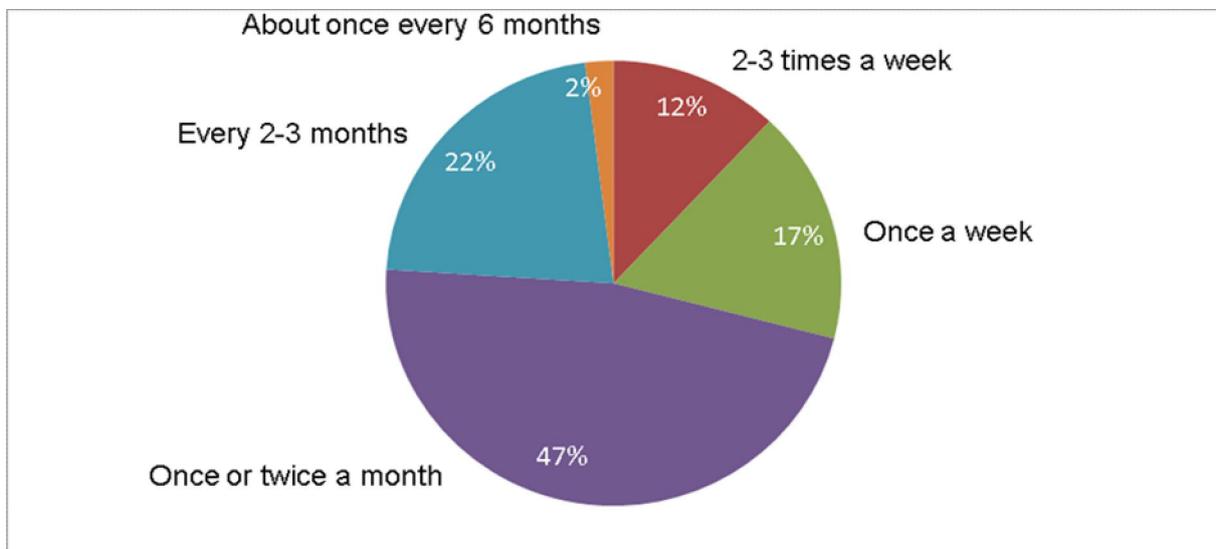
### Making contact

Nearly half of respondents to the telephone survey say that they are in contact with the ICO once or twice a month (47%); dual role stakeholders are more likely than implementation stakeholders to have frequent (weekly) contact (13 of the 38 dual role stakeholders compared to 2 of the 19 implementation role stakeholders).

Fig 1

### Frequency of contact with the ICO

Q1. How often, approximately, would you say you are in contact with the ICO?



Base: All respondents to the telephone survey (58)

Source: Ipsos MORI

Most of the participants in the depth interviews indicate that they have regular, formal meetings with a representative of the ICO – often quarterly – to discuss policy development and interpretation or implementation. However, most speak much more frequently to the ICO (especially those with complaint resolution roles) and they value the ability to seek advice on an ad hoc and informal basis.

**I wanted a sounding board for a particular problem that we've got; it was freedom of information but it was related to a data protection law and it was a gut reaction really about whether or not the ICO felt that there was an issue here or not.**

Depth interview, complaint strand

Participants in the depth interviews also state that contact is more often initiated by the stakeholder rather than the ICO. Indeed, one of the most valued aspects of their relationship with the ICO is the ability to pick up the phone and seek advice from their contact when they need it without having to rely on more formal communication channels.

**In our compliance function ... I would often be at odds with the lawyers in our business over interpretation of the Act, and we could always go to the Information Commissioner and say "look, we've got some internal discussions going on about what is meant by this and we think this and they think that, what's your view?"**

Depth interview, implementation strand

**I think [what I value most is] the ability to be able to just pick up the phone and talk in a fairly informal and relaxed way about issues.**

Depth interview, complaint strand

**If there was something urgent we'd just ring them up.**

Depth interview, implementation strand

**I can phone or email them and say "this matter is ahead of us, shall we meet and talk about it" and they're always accommodating; they're always able to make the time and do make the meetings.**

Depth interview, implementation strand

**I often [make an enquiry] on an informal basis rather than a formal ... as in picking up the phone and saying "what's the ICO's views on this?" rather than trying to seek a correspondence or something set on record.**

Depth interview, policy development strand

All participants in the depth interviews speak highly of the speed with which such enquiries are answered.

**We get a very helpful and very quick response to any particular queries we have.**

Depth interview, implementation strand

**So we turned to the ICO and said “it is personal data but in our view, under the Transparency Agenda & Accountability, then it would be in the best interest of the public for that personal data to be made [public]” ... which the ICO agreed with and immediately drafted a letter to us to that effect so that we could then use that as evidence for why we were taking the approach that we’re doing.**

Depth interview, implementation strand

Equally, they find a single point of contact useful in directing them to the right member of ICO personnel.

**It has certainly improved latterly because they’ve come up with this new approach of having a single point-of-contact ... that’s been welcomed because obviously sometimes navigating as to who to go to can be a bit of an issue.**

Depth interview, implementation strand

## Feeling informed

### Summary

Two-thirds of respondents (66%) feel they are kept informed by the ICO, although a significant minority would like more communications.

The ICO's website is the main information source and a preferred source for most respondents, however there are issues around the usability of the search function and the topicality and relevancy of all the information stored on it.

### Keeping stakeholders informed

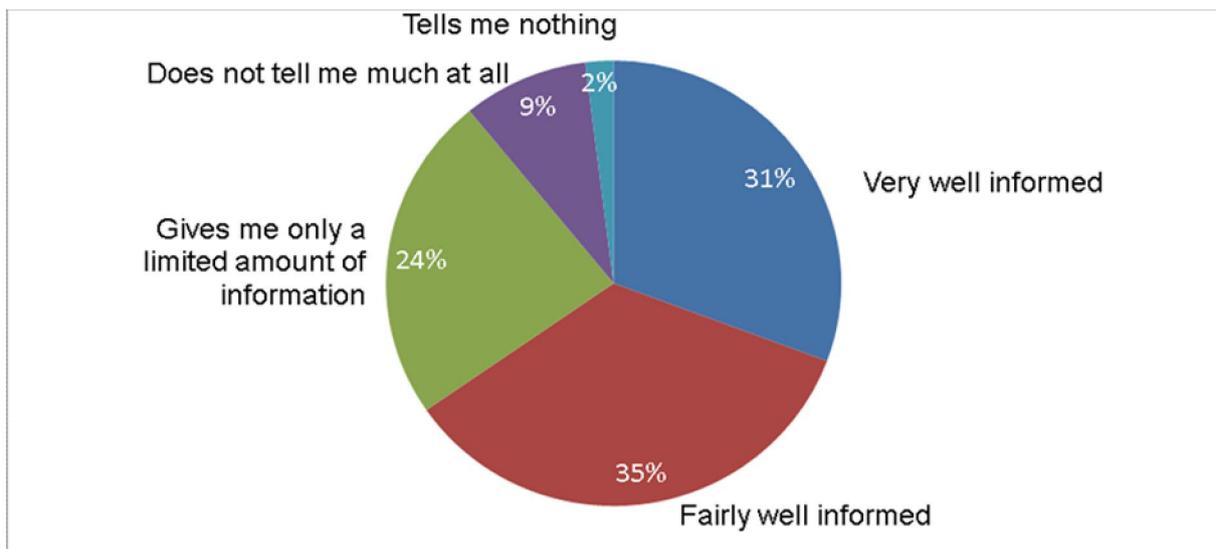
The ICO is seen as keeping its stakeholders well informed, although how well informed they feel depends on the role of the stakeholder.

When asked how well informed they think the ICO keeps them about those areas where they work together, the majority (66%) of telephone respondents say the ICO keeps them very or fairly well informed. Implementation stakeholders feel particularly well informed (47% say that they feel very well informed).

Fig 2

### Keeping stakeholders informed

Q25. How well informed do you think the ICO keeps you about the areas which you work on with them?



Base: All respondents to the telephone survey (58)

Source: Ipsos MORI

The stakeholder depth interviews back this up.

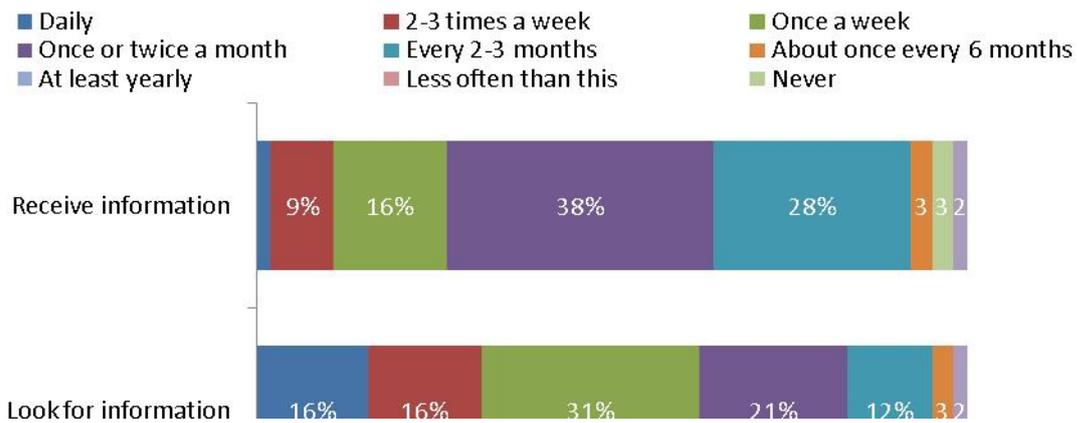
Stakeholders look for information more frequently than they receive information: six in ten (62%) look for information at least once a week, one in four receive information this frequently (26%). Again those with a dual role look for information more frequently (nearly three-quarters (71%) look for information weekly).

Fig 3

Frequency of receiving/looking for information

Q26. How frequently do you receive communications from the ICO?

Q27. And how frequently do you look for information produced by the ICO about information rights (that is related to freedom of information or data protection)?



Base : All respondents to the telephone survey (58)

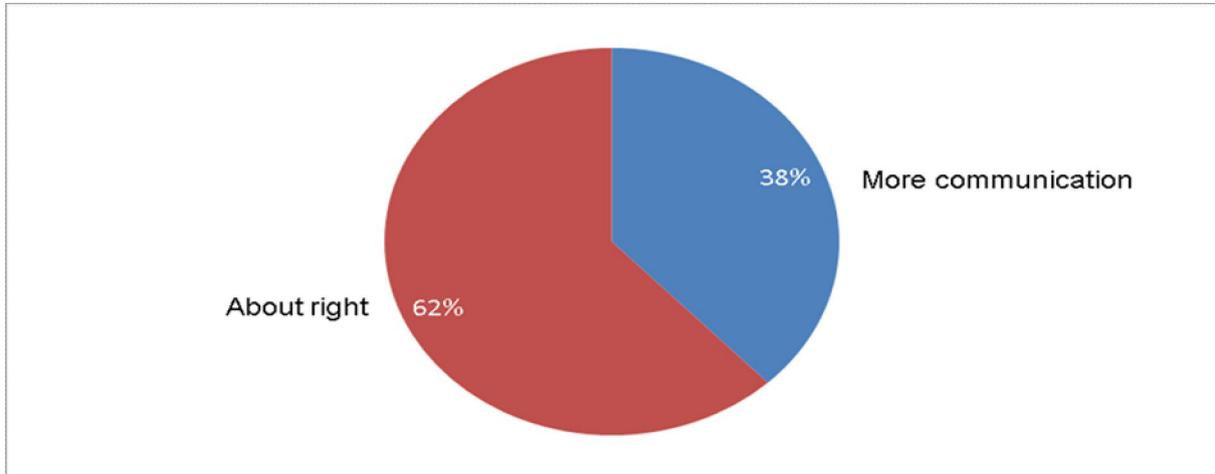
Source: Ipsos MORI

Among the telephone survey respondents, four in ten (38%) say they would like the ICO to be communicating with them more often; the remaining respondents (62%) say the balance in communications is about right.

Fig 4

Preferred frequency of communications

Q28. Should the ICO be communicating with you more or less or is the balance about right?



Base: All respondents to the telephone survey (58)

Source: Ipsos MORI

The main reason for wanting more communications is to create a better relationship and dialogue between their organisation and the ICO.

**Build up more of a relationship and help us to understand a bit more about what they are about.**

Telephone interview - Dual role stakeholder, complaint strand

### Information sources

The website, and its function as a store of downloadable information, is a key source of information. Nearly all respondents to the telephone survey are aware of the ICO website (98%), and the ability to download information from it (97%). Further, the website and downloading information are the main ways respondents currently get information (79% and 64% respectively), and they are also the most preferred sources of information (59% and 53% respectively).

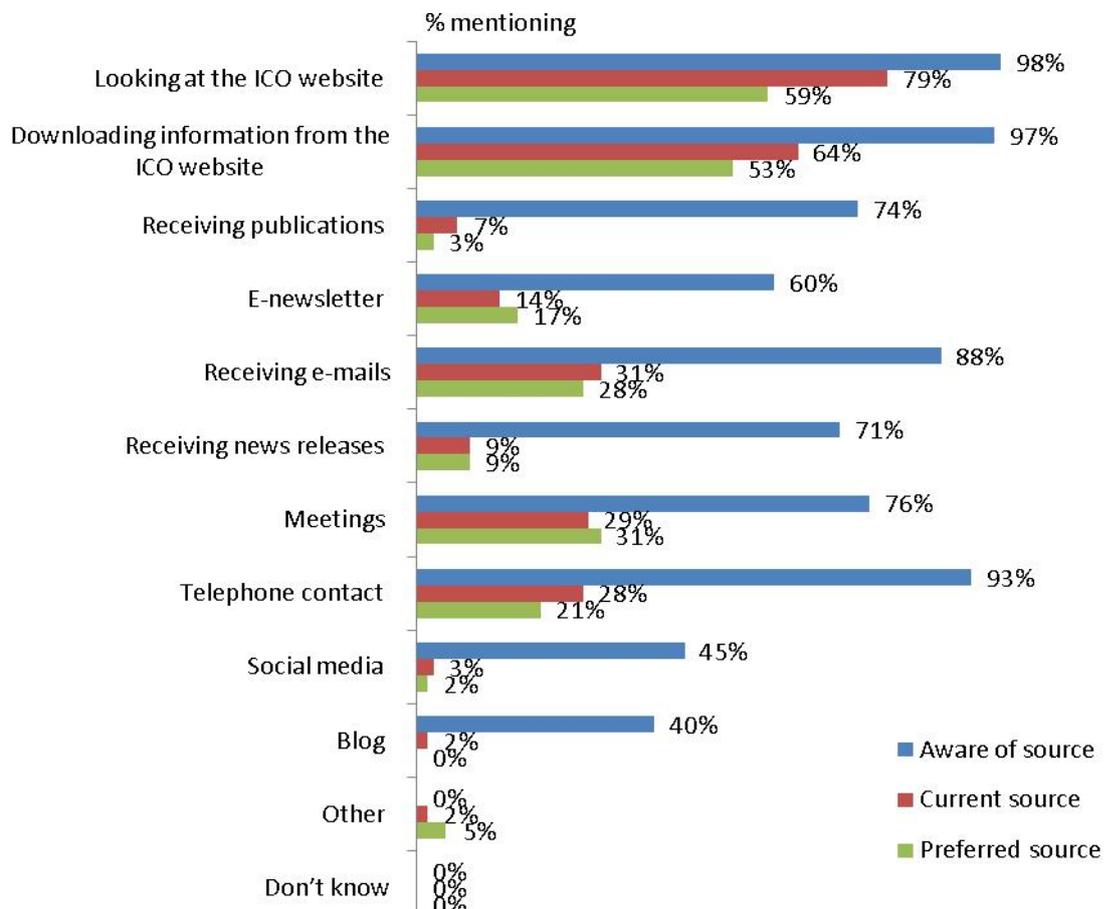
Fig 5

### Information sources

Q30. Which, if any, of the following information sources from the ICO are you aware of?

Q31. In which ways do you currently get most of the information you need from the ICO?

Q32. And how would you prefer to get most of the information you need from the ICO?



Base : All respondents to the telephone survey (58)

Source: Ipsos MORI

Receiving emails (88%), telephone contact (93%) and face-to-face meetings (76%) are also well recognised sources of information. Though fewer stakeholders use these sources there

does not appear to be any unmet demand for these options. Indeed the preferred sources of information closely match the currently used sources of information.

Two-thirds of those who use the ICO website (66%) say that it is a good source of information. The value placed on the website by stakeholders is illustrated in their wish to see it improved, specifically maintaining and keeping the online library up to date.

**Need to be updating their communications generally. I'd like to be able to find far more information about the issues I deal with ... I don't see their guidance being updated as much as it should be, for example Workplace Survival Guide.**

Telephone interview - Policy/implementation role, implementation strand

The only negative comments about the website refer to the ease of navigation, and specifically the ability to search for information – with respondents to the telephone survey and the depth interviews mentioning the problems of finding the specific information they require.

**Unless you actively look for stuff, you have to know it's there.**

Telephone interview - Dual role stakeholder, implementation strand

**The knowledge is really hard to find and I had to get an email sent with a link to it to be able to find it.**

Telephone interview – Dual role stakeholder, Implementation strand

One depth interview participant also suggested removing superseded advice/ guidance as an action the ICO should take. Further, several depth interview participants mention that they track the decisions coming out of the ICO, tribunals and other adjudicating bodies – for them having an up-to-date source of information is seen as an improvement over the current website.

Among the seven respondents who are aware of the website but do not use it, five say this is because their work is too specialised – nearly all of these respondents are involved with policy development rather than implementation.

## Working relationship with the ICO

### Summary

The ICO clearly has very good relationships with its key stakeholders, being seen to work in a collaborative manner and acknowledging the expertise of their stakeholders.

**We've been able to work together to bring around the required improvements which they wanted and obviously it's helped the Metropolitan Police, so that's been really, really constructive.**

Depth interview, implementation strand

Stakeholders generally have very positive perceptions of the ICO staff they contact and relationships are generally seen to have either improved or stayed the same.

Experiences of more junior staff, essentially the complaint case worker level, are less good. The issues for stakeholders are twofold:

- new case workers are perceived to lack knowledge of the client and established working practices; and
- inconsistencies in the advice given by different individuals on the same point of compliance.

**I think it's fair to say we have had issues with the case workers from those [regional] offices, either having a different interpretation of the Act or dealing with things in a way which we'd already agreed with Wilmslow wouldn't happen in the future.**

Depth interview, implementation strand

However, for most stakeholders this is not seen as being a major problem, more a niggle or an irritation rather than an issue. For those depth interview participants who mention this as an issue better internal ICO communications for staff at this level about the stakeholder's organisation and sector are seen as a solution.

One comment from the depth interviews sums up stakeholders' perceptions of ICO staff:

**The staff at the ICO are reliable and sensible which is sort of a key defining factor of a service really**

Depth interview, complaint strand

### Defining stakeholders' relationships with the ICO

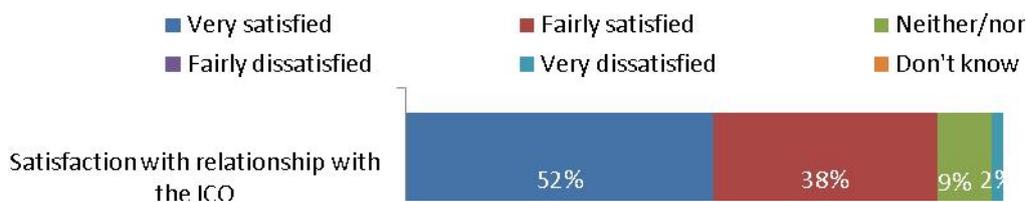
All of the participants in the depth interviews have a designated contact at the ICO, all use this person as their first port of call when making an enquiry. It is the seniority of their contact at the ICO which is valued by participants in the depth interviews – their contact's ability to speak with authority and experience and offer the guidance which they seek. Another key aspect of the personal relationship is the ability of their contact to act as a gatekeeper, signposting queries to the most appropriate personnel at the ICO.

**We have a very progressive relationship, a very open relationship, we have the ability to speak to key individuals on the phone and get guidance fairly quickly, we get a very good response from them and I think that’s testament to the way the relationship is established.**  
 Depth interview, implementation strand

Nearly all respondents are satisfied with the relationship they have with the ICO (90%), indeed half are very satisfied (52%). Implementation role stakeholders are more likely to say they are very satisfied (74%). One respondent is dissatisfied with the relationship; with five saying they are neither satisfied nor dissatisfied.

Fig 6  
 Satisfaction with relationship with the ICO

Q13. Overall how satisfied or dissatisfied are you with the relationship you have with the ICO?



Base : All respondents to the telephone survey (58)

Source: Ipsos MORI

These views are highlighted in comments made by participants in the depth interviews which reflect their positive feelings about the working relationship whilst being mindful of the ICO’s regulatory role.

- They describe a relationship of two **equal partners**, each with acknowledged areas of expertise. Several mention that they work closely with the ICO on committees and other bodies responsible for ensuring continuing information rights compliance in their sector.

**We help them with investigations that they’re making, so we will actually volunteer information to them to help them with any investigations that they’re doing. For example, I think there’s an investigation on-going at the moment in relation to spam marketing.**

Depth interview, complaint strand

**I think we have our own expertise and we both bring something to the table.**

Depth interview, implementation strand

**In certain areas [the relationship is] critical; there are things that we need to be able to do with personal data to advance our business but without the help and support of the ICO it wouldn't be possible for us to achieve.**

Depth interview, implementation strand

- While all state that the ICO listens to but does not always agree with their opinions, this is felt to be a natural consequence of **the ICO's dual role** as advisor and regulator and hence is not seen as an issue in the relationship.

**Where we may not necessarily agree with an interpretation, ultimately we may go to an Information Tribunal ... in order to get some meaningful case law on the interpretation of a particular legal argument. But we'll do that in a not falling out way wherever possible because we value the relationship.**

Depth interview, implementation strand

**We had a really pragmatic way of accepting that we weren't going to win this argument, and looking at how we could manage it.**

Depth interview, implementation strand

**It's very professional but not a cosy relationship, and I think that's the way it should be because clearly the thing to remember is that the Commissioner is a regulator first.**

Depth interview, implementation strand

- In general the relationship with the ICO is seen as different to that with **other European regulators** who take a more "hard nosed" attitude to data protection legislation enforcement. Participants value their more informal relationship with the ICO, specifically the ability to ask for advice and clarification rather than having to make formal submissions.

**[The relationship with the ICO is] very different from the way that many European countries operate, where it's a lot more confrontational.**

Depth interview, implementation strand

**I think that the Commissioner in this country is outstanding in relation to the method that they employ in furtherance of their office. The willingness to provide guidance and to be receptive to questions that we may raise is actually rather unique. My view is that certainly across the rest of Europe, there is a much more hardnosed line now being taken with regard to the role and function of Information Commissioners.**

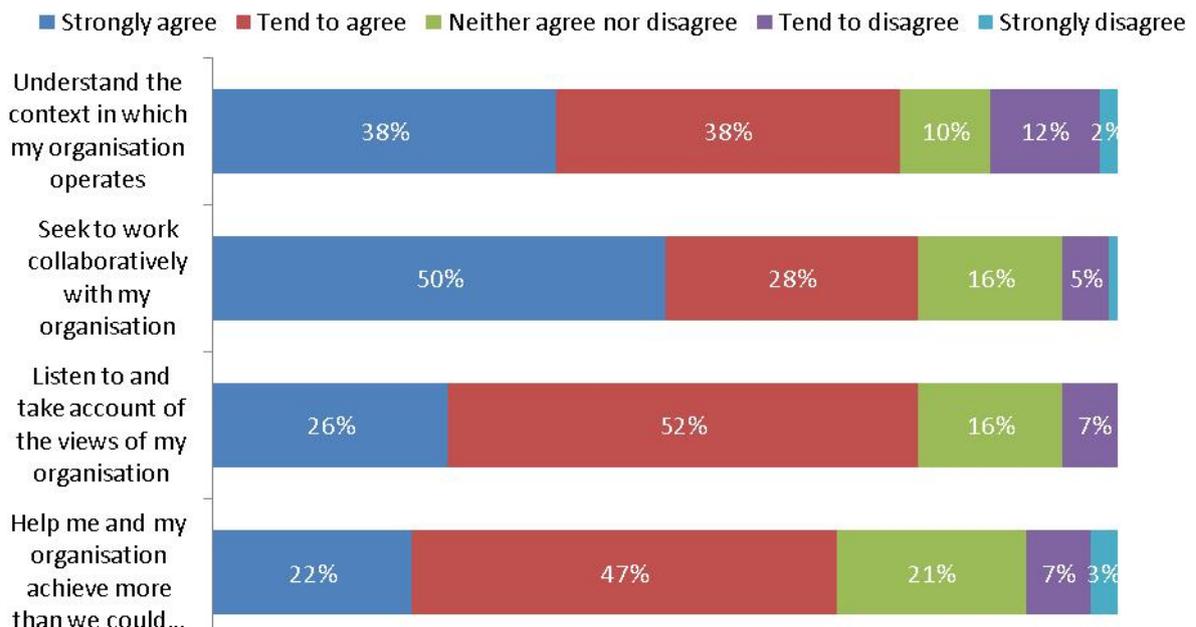
Depth interview, implementation strand

These views are also apparent among respondents to the telephone survey where three-quarters see ICO staff as seeking to work collaboratively (78%), to listen to and take account of their organisation’s views (76%), hence to understand the context in which the stakeholder’s organisation works (78%) and to help them achieve more than they could working alone (69%). In all these aspects although both types of stakeholders are equally likely to agree they apply, implementation/policy role stakeholders are more positive – being more likely to say they strongly agree than are dual role stakeholders.

Fig 7

Opinions of ICO staff

Q16. Thinking about how the ICO staff engage with you and your organisation, to what extent do you agree or disagree that they...?



Base: All respondents to the telephone survey (58)

Source: Ipsos MORI

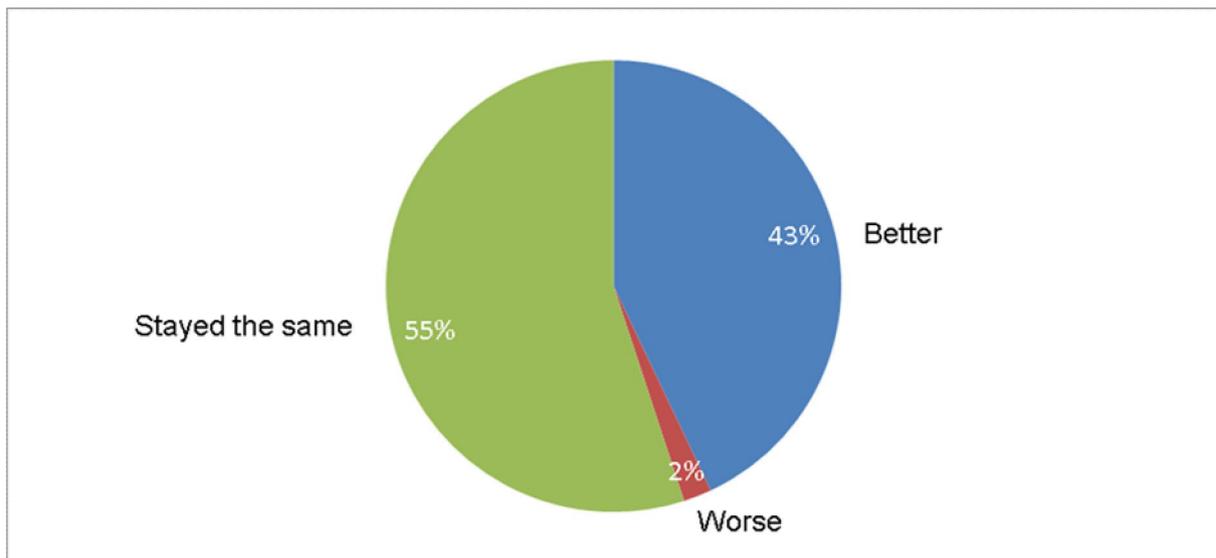
## Changes to the relationship

All but one respondent to the telephone survey say their relationship with the ICO has either stayed the same or improved (98%). These views are shared by participants in the depth interviews.

Fig 8

### Perceived change in relationship

Q17. Would you say that over the past year your working relationship with the ICO has got better, worse or stayed the same?



Base: All respondents to the telephone survey (58)

Source: Ipsos MORI

Dual role stakeholders are more likely to say the relationship has stayed the same over the last year (63%); implementation role stakeholders are more likely to say that it has got better (58%).

Reflecting earlier comments, it is increased communication which has had a positive impact on relationships, together with a willingness on the part of the ICO to focus on specific issues of interest to individual stakeholders. Typical comments from the telephone survey which illustrate this point include:

**Because we seem to have more interaction and they seem to have a designated case worker for each business they are dealing with at the time ... You are dealing with someone that's specifically dealing with the business.**

Telephone interview - Dual role stakeholder, complaints strand

**We have more contact and are working on a range of issues.**

Telephone interview - Implementation stakeholder, implementation strand

**They understand us a lot better and we understand them a lot better. They've taken the time to look at the complexities with our world rather than a one size fits all [view].**

Telephone interview - Dual role stakeholder, implementation strand

The importance of this willingness on behalf of the ICO to spend time learning about stakeholders is reinforced in the depth interviews:

**We do data, so data protection is core to everything we do. So we're very keen to get it right and to understand what the objectives are and the Information Commissioner has been very supportive in working with us to make sure that we are working in step with them and we're keen to do that.**

Depth interview, implementation strand

The one telephone respondent who is dissatisfied with their relationship with the ICO also feels their relationship has deteriorated in the last year. Whilst the relationship is not satisfactory, the respondent is positive about the professionalism and attitude of staff. Their dissatisfaction with the relationship is based on disagreements around policy development and implementation and the role they feel the ICO should play.

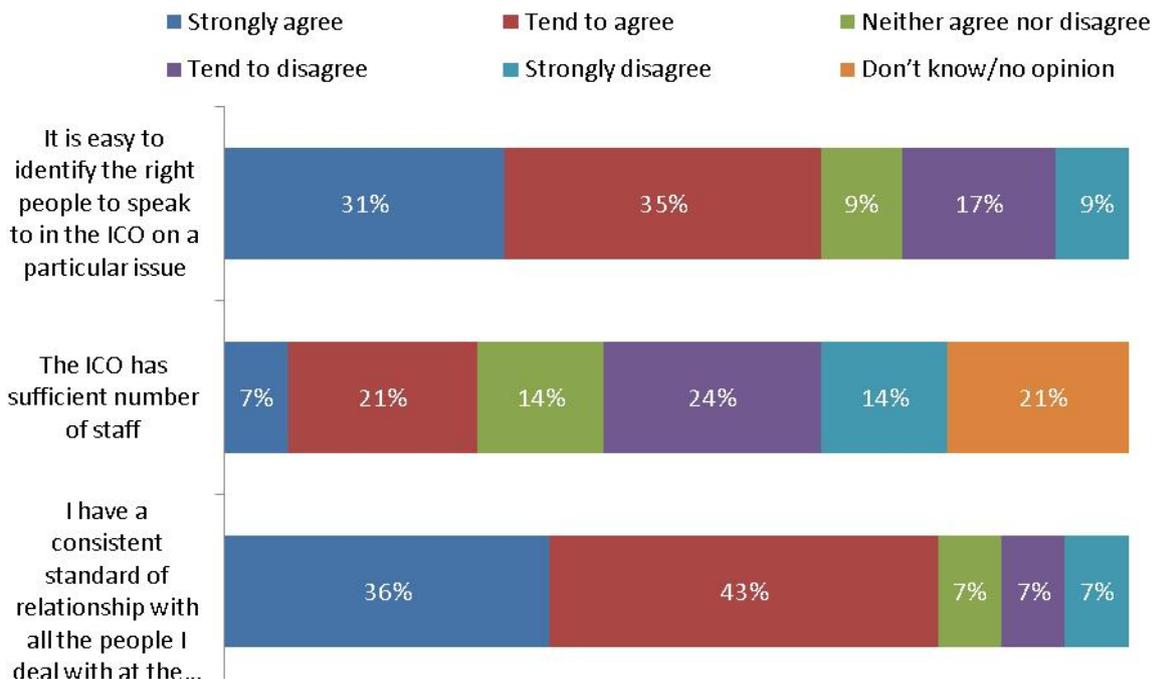
## Perceptions of staff

In general in the telephone survey, implementation/policy development role stakeholders are more positive about their relationships with staff at the ICO than are dual role stakeholders – they are more likely to agree that it is easy to identify the right contact (three-quarters (79%) of implementation stakeholders compared to six in ten (58%) of dual role stakeholders) and that they have a consistent standard of relationship with the people they deal with (89% compared to 74% respectively). Respondents in the telephone survey feel less able to say whether the ICO has sufficient staff, with one in five (21%) saying they don't know and opinion fairly evenly split between agreement (28%) and disagreement (38%) that there is sufficient staff for those who answered.

Fig 9

### Perceptions of ICO staff

Q14. And how much do you agree or disagree with the following statements?



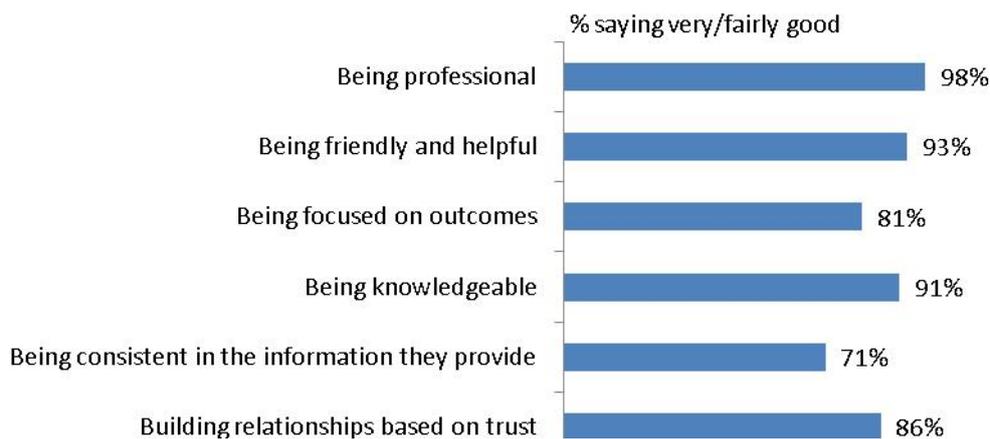
Base: All respondents to the telephone survey (58)

Source: Ipsos MORI

Generally ICO members of staff are viewed positively by stakeholders in the telephone survey, being seen as professional, helpful, knowledgeable and building relationships based on trust. Where there is less agreement is with regard to consistency of information and being focused on outcomes.

Fig 10  
Staff Attributes

Q15. I am going to read out a number of attributes which describe how people work. Thinking about the people you typically deal with at the ICO, can you rate them against each of these attributes according to whether you think the people are generally very good, fairly good, poor or very poor in this area.



Base : All respondents to the telephone survey (58)

Source: Ipsos MORI

Again, implementation/policy development role stakeholders in the telephone survey are more positive than are dual role stakeholders, perhaps reflecting the more one-to-one relationships among the implementation stakeholders compared to the casework based handling of complaints which means dual role stakeholders are speaking to a wider pool of (more junior) ICO staff.

### Consistency of information and advice

The issue raised most in the telephone survey and depth interviews is consistency of information and advice, and is centred on case worker level contact. Several participants in the depth interviews suggest the problem may arise from lack of experience at this level, or lack of understanding of the business context of the stakeholder's organisation – with the consequent frustration at having to repeat this process with each new case worker when complaints are being processed.

**Sometimes there are slightly different interpretations and I can't speak specifics there, but I know team members have raised concerns that perhaps different individuals within some of the teams take a slightly different line than that of previous people.**

Depth interview, implementation strand

**If somebody new is dealing with something, they don't necessarily understand the process that we have in place.**

Depth interview, complaint strand

**I think perhaps that understanding of what we're trying to achieve isn't always present at a lower level within the team, so through dialogue we're trying to improve that again with the enforcement teams within the ICO's areas, because I think some of the staff perhaps at a lower level operate perhaps at a more process level and don't always have the understanding of what we're struggling with.**

Depth interview, implementation strand

Several stakeholders find the inconsistencies in knowledge to have negative implications for their organisations, and cause more work as they need to reiterate established working practices with each new ICO member of staff. For other stakeholders the inconsistencies in advice are less of an issue and more a reflection of the complexity of information rights legislation itself and the lack of precedent-based interpretation.

**I think they may find it difficult to definitively say "this is what you can do or can't do". There's always this onus back to say "this is our advice but ultimately it's your decision" and I think that's probably down to the high level Act really.**

Depth interview, implementation strand

## Advocacy of the ICO

### Summary

It is clear that the ICO is seen as both important to the success of stakeholders' organisations and also influential in the way information rights law is applied. The majority of stakeholders are advocates of the ICO, with a minority being neutral and fewer than one in ten being critics. The main factors resulting in negative views are inconsistency in information, advice and guidance and a perception that the ICO is not taking a proactive enough role.

These positive findings are reflected in the ICO's performance against the Ipsos MORI public sector norms – with the ICO achieving more positive scores for each measure.

### The ICO's influence

It is clear that the ICO is seen as both important to the success of stakeholders' organisations and also influential in the way information rights law is applied within their organisation.

The importance of this influence is reflected in comments from the depth interviews where several participants report actively looking for decision notices and monitoring how information rights are developing in order to ensure that they are kept up-to-date with issues. Their definitive source of information for this is the ICO website and the ICO is their arbiter of whether the implementation has been successful.

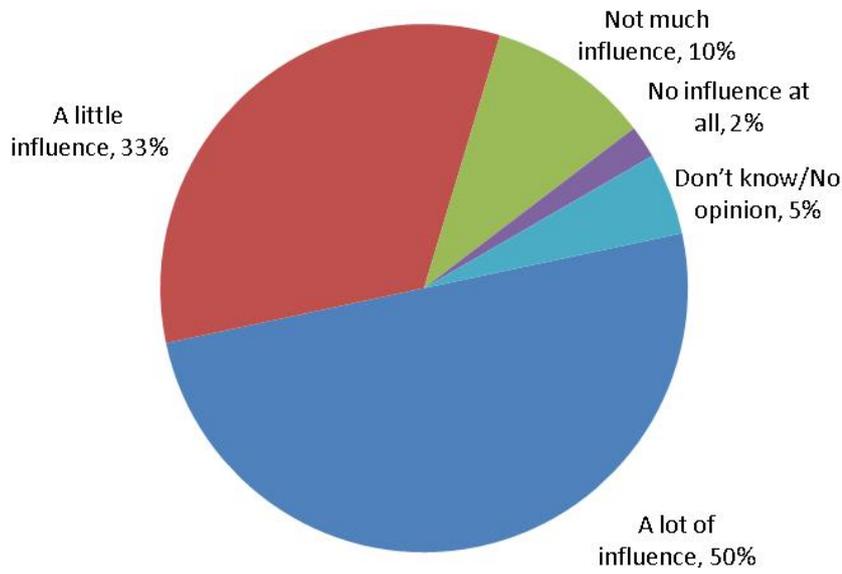
**We have to keep those close links with the regulators simply because the volume of data that we handle, the level of business that we're managing, we are a significant data controller and we want to make sure that we're not spending billions of pounds doing something that actually the Information Commissioner wouldn't be happy with.**

Depth interview, complaint strand

More than eight in ten (83%) say the ICO has influence in their organisation, with half (50%) saying it has a lot of influence.

*Fig 11*  
ICO's influence over application of information rights law

Q10. How much influence, if any, does the ICO have over how your organisation applies information rights law?



Base : All respondents to the telephone survey (58)

Source: Ipsos MORI

Participants in the depth interviews concur with these sentiments.

**It has a huge influence, it's a principle regulator and with our principle asset being data, what they say goes and doesn't go is paramount to what we do.**

Depth interview, implementation strand

Where they say the ICO has less influence it is generally because their organisation commits a large amount of resource to the issues around information rights and has built up considerable internal expertise, therefore the ICO's advice and guidance is welcome but not crucial to their success.

**We use them as a bit of an advertising background for its enforcement role but nothing much more than that. Our main focus is to convince people to do things properly and efficiently because that's really what it's all about.**

Depth interview, complaint strand

**Compared to other regulators [the ICO's influence is] pretty low; we as a business obviously data privacy is one of our key activities. We have our policy and our framework in place and we have a reporting line that goes up through the various governance committees to highlight any issues and get activities undertaken if we need to, to be compliant.**

Depth interview, complaint strand

**I would say that a police service, not just Met Police, but the police service has always taken both sets of legislation seriously and I don't think there's any undue influence that regulatory bodies have. I think we've always wanted to comply anyway.**

Depth interview, implementation strand

**We make decisions not because we think that the ICO is sitting on our shoulder watching every move, but I think what they've done is that they've given us and organisations like ours a pretty good basic understanding of what they expect.**

Depth interview, implementation strand

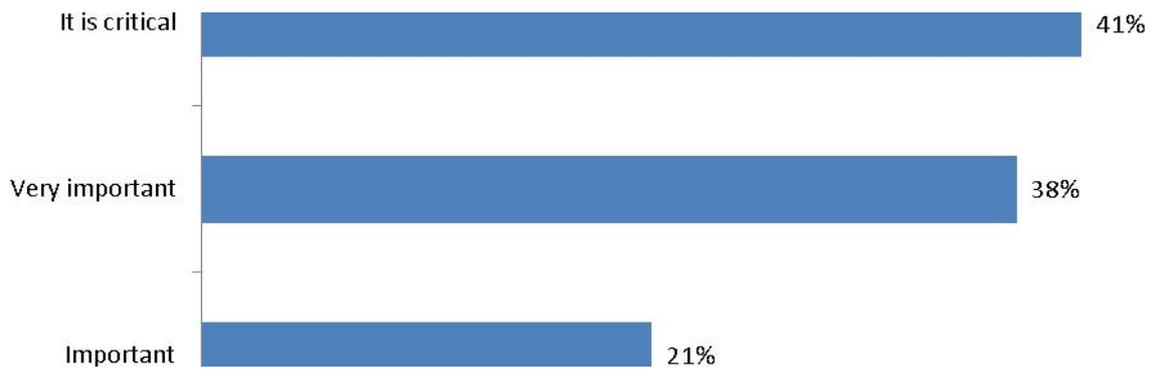
Four in ten respondents to the telephone survey (41%) consider the contact they have with the ICO to be critical to the success of their work, a further four in ten feel it is very important (38%). These views are also apparent among participants in the depth interviews.

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Fig 12

Importance of the ICO to stakeholders' organisations

Q2. And how important is the contact you have with the ICO to the success of your work (i.e. to help you and your organisation deliver your goals)? Would you say...



Base: All respondents to the telephone survey (58)

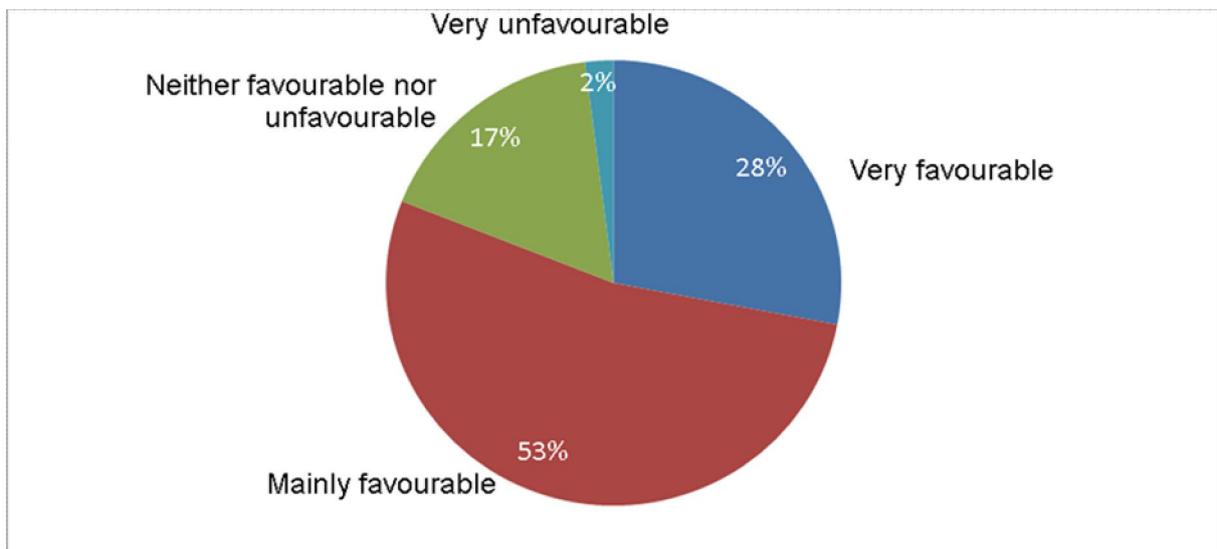
Source: Ipsos MORI

In the telephone survey eight in ten (81%) say they view the ICO favourably with a quarter (28%) saying they have a very favourable view – this is more positive than the Ipsos MORI public sector organisation benchmark where two-thirds (66%) hold favourable views of the organisation.

Fig 13

Overall opinion of the ICO

Q3. How favourably or unfavourably do you regard the ICO, bearing in mind we are interested in your overall impressions?



Base: All respondents to the telephone survey (58)

Source: Ipsos MORI



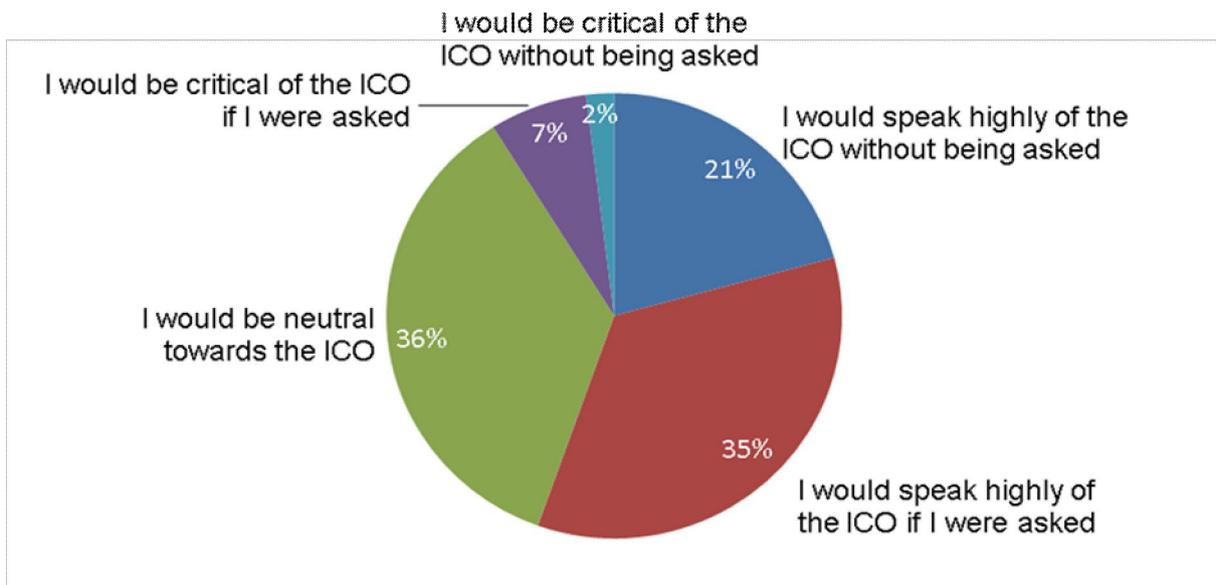
## Advocates

All of the participants in the depth interviews and over half of respondents to the telephone survey are advocates of the ICO (55%), a third (36%) would be neutral; fewer than one in ten (9%) would be critical of the ICO. These findings are in line with the Ipsos MORI public sector organisation benchmarks (46% would be advocates, 40% neutral and 12% critics).

Fig 14

### Advocacy of the ICO

Q4. Which of these phrases best describes the way you would speak of the ICO to other people?



Base: All respondents to the telephone survey (58)

Source: Ipsos MORI

It is the quality of advice, and the pragmatism displayed in their advice, as well the professionalism of staff which underlies the opinions given by advocates. Typical comments from respondents who would speak highly of the ICO include:

**They have always given us good advice on freedom of information and data protection. I respect their professionalism.**

Telephone interview - Dual role stakeholder, implementation strand

**As an organisation I find them open, accessible and responsive. They take time to understand their stakeholders' issues and approach.**

Telephone interview - Policy/implementation role stakeholder, implementation strand

**I find them very approachable. Their advice and guidance is very pragmatic. They are aware of commercial issues.**

Telephone interview - Dual role stakeholder, complaint strand

**Compared to the regulators in the EU they have a very sensible approach.**

Telephone interview - Dual role stakeholder, complaint strand

## **Critics**

For the five respondents who would be critical of the ICO it is issues around inconsistency of the advice given by ICO staff, and to a lesser extent a feeling that the ICO has not taken up the leadership role expected of them, which underlies their critical views.

**I think it's very often inconsistent. My clients ring the ICO for advice and get advice off one person and then totally different advice off another.**

Telephone interview - Policy/implementation role stakeholder, implementation strand

**[It] can sometimes be a bit difficult to get a clear answer so on the project I'm working on I've heard a lot of comments from other people about this ... We're not always sure what they're saying to me is the general consensus with what they're saying to someone else. If you speak to someone else in the industry they have been given a slightly different view.**

Telephone interview - Policy/implementation role stakeholder, implementation strand

**I don't believe that they play the leadership role they should be playing. They seem to arbitrate a very limited interpretation of the Data Protection Act whereas their counterparts in almost all jurisdictions play a more proactive role.**

Telephone interview - Policy/implementation role stakeholder, implementation strand

While none of the depth interview participants would speak critically of the ICO, they also mention these issues.

## Effectiveness of the ICO

### Summary

In both the depth interviews and the telephone survey nearly all feel that the ICO is either more effective now than a year ago or is as effective as a year ago. What they value the most about the ICO and what they feel needs improving can be jointly summarised as the quality of support and guidance provided and the overall relationships which the ICO has with stakeholders.

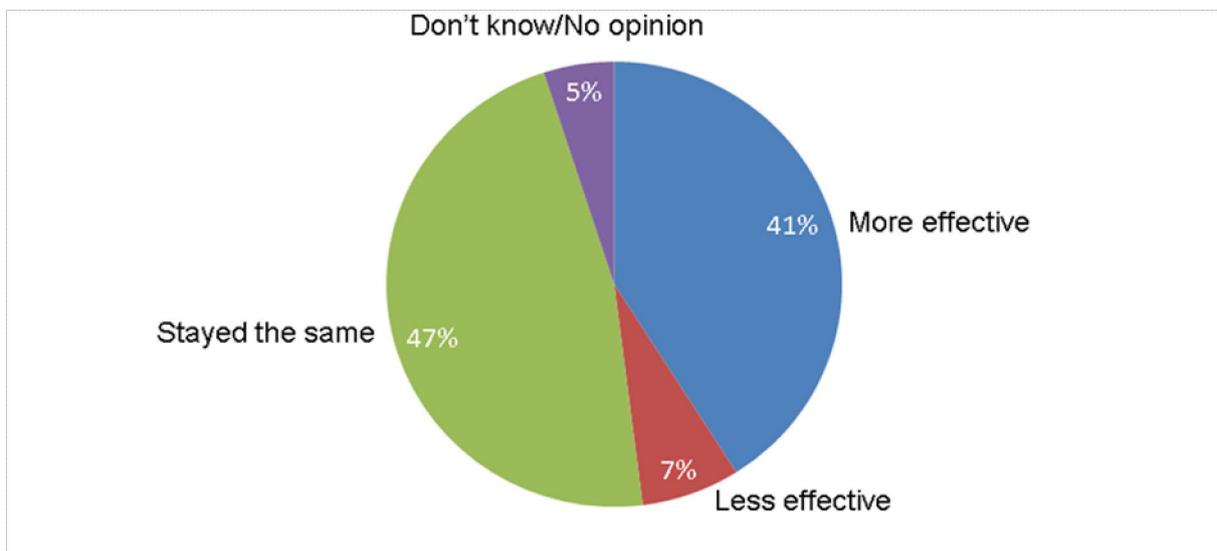
### Compared to a year ago

Nearly all respondents to the telephone survey feel that the ICO is more effective now than a year ago (41%) or is as effective as a year ago (47% of respondents). This is similar to the views expressed in the depth interviews.

Fig 15

Effectiveness of the ICO compared to a year ago

Q7. Compared to one year ago, do you think the ICO is more effective or less effective in its role now or has it stayed the same?



Base: All respondents to the telephone survey (58)

Source: Ipsos MORI

Among telephone survey participants, four respondents feel that the ICO is less effective now than a year ago, three of these respondents have policy development/ implementation roles.

**The programme I'm working on, there is a lot of policy debate going on about privacy and data protection. The ICO haven't necessarily**

**taken as much of a leading role in that as perhaps they should have done in my view. They have not given as clear advice to some people in the programme as they could have.**

Telephone interview - Policy/implementation role stakeholder, complaint strand

**I believe since the change in leadership there has been a slight loss in the consistency being dispatched from the top and the individuals we deal with.**

Telephone interview - Policy/implementation role stakeholder, implementation strand

**They are better at managing data protection breaches but in relation to ISO regulation they are not as thorough.**

Telephone interview - Dual role stakeholder/complaint strand

Improved effectiveness is the result of improved communications and more efficient working (especially with regard to the backlog of complaints).

**It comes down to communication, leadership and a more public facing role.**

Telephone interview - Dual role stakeholder, complaints strand

**[It's more effective] because its complaints handling is significantly more efficient.**

Telephone interview - Policy/implementation role stakeholder, implementation strand

**Better case handling procedures. Their bureaucracy has been cut down and quicker decisions.**

Telephone interview - Dual role stakeholder, implementation strand

To a lesser extent improvements in enforcement action is also seen to make the ICO more effective now compared to a year ago.

**They are now showing their teeth with fines. Now taken more seriously, they are to be feared as before they were toothless.**

Telephone interview - Dual role stakeholder, complaints strand

### **Improving effectiveness**

For participants in both the telephone survey and the depth interviews, what they value the most and what they feel needs improving can be jointly summarised as the quality of support and guidance provided and the overall relationships which the ICO has with stakeholders<sup>2</sup>. So while it is advice and support which is most valued, this is also an area where

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<sup>2</sup> A copy of all the comments made to these questions in the telephone survey can be found in the appendices.

improvements could be made – specifically around the frequency of communications and providing a user-friendly website with easier to understand guidance.

**I think [the ICO should] continue with the regular and proactive dialogue with us which we find supports us in our objective to comply with the legislation.**

Depth interview, implementation strand

Equally while many stakeholders value how accessible and approachable ICO staff are, many also want a better relationship with greater understanding of their organisation (this view is strongest among respondents to the telephone survey). As put simply by several depth interviewees – the simple fact that the ICO is there is what they value most, the ICO's presence as an external regulator is useful when talking to (sometimes reluctant) internal colleagues about the importance of compliance with the various pieces of legislation.

**Knowing particularly under DPA that they have enhanced powers does concentrate the mind of my employees and the staff in this organisation just a little bit more and reinforces the organisation's view on how important it is to get these things right.**

Depth interview, implementation strand

In addition to these views, depth interview participants also mention the role of the ICO in championing the excellence of data protection compliance in the UK; the ICO taking a more proactive policy development role and increasing focus on their enforcement role.

**What I want them to do is to bang the drum a bit more about how good data protection is in the UK.**

Depth interview, implementation strand

The telephone survey also offered respondents the opportunity to say what they think are missing priorities; here nearly half of respondents said nothing. Among those who gave a response there is a wide range of issues with several emerging themes<sup>3</sup>:

- Playing a more proactive role in policy development/harmonisation;
- Increasing the enforcement role/activity;
- Reducing the burden of compliance on organisations; and
- Educating the public in their individual responsibilities as well as their information rights.

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<sup>3</sup> A copy of all the comments made to this question in the telephone survey can be found in the appendices.

## The ICO’s advisory role

### Summary

Generally participants feel that the ICO is effective in its role as an advisor and in offering guidance on existing information rights practice. Perceptions on the effectiveness of specific aspects of the ICO’s role are largely determined by whether the respondent has an implementation/policy development role or a dual role.

It is with regard to emerging issues and technologies, such as cloud computing, data anonymisation and contactless payment technology where the ICO is seen as less effective, with stakeholders expressing a wish for speedier advice to be provided in this area.

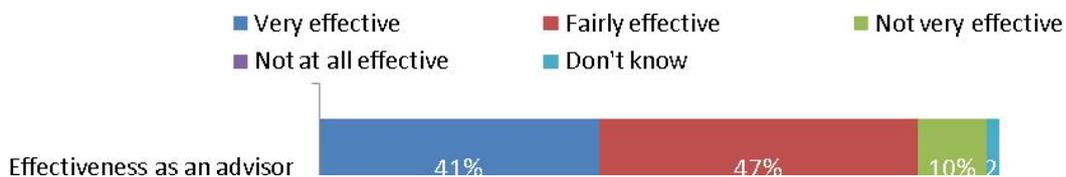
### Perception of the advisory role

Nine out of ten respondents to the telephone survey (88%) feel that the ICO is effective in its role as an advisor. Five of the six respondents who feel the ICO is not effective are dual role stakeholders.

Fig 16

#### Effectiveness of the ICO as an advisor

Q6. The ICO has a number of roles, how effective, if at all, is the ICO in ...?



Base : All respondents to the telephone survey (58)

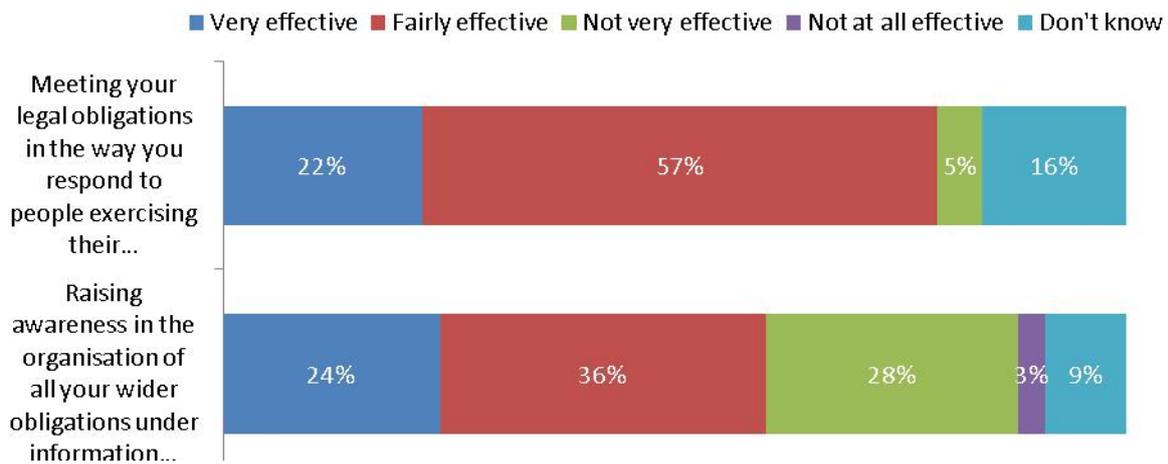
Source: Ipsos MORI

The ICO is seen as effective in helping stakeholders' organisations to meet their legal obligations around information rights by eight in ten telephone survey respondents (79%). Dual role stakeholders are more likely to say the ICO is effective at this than are policy/implementation role stakeholders (92% and 53% respectively).

Fig 17

Effectiveness of ICO in helping stakeholders' organisations

Q9. How effective, if at all, is the ICO at helping your organisation to achieve the following outcomes?



Base: All respondents to the telephone survey (58)

Source: Ipsos MORI

Six in ten telephone survey respondents (60%) feel the ICO is effective in helping to raise awareness of the wider information rights law obligations in their organisations. For this statement policy and implementation stakeholders are more likely to agree than are dual role stakeholders (63% and 58% respectively).

**There was some European legislative proposals which came out last week and they just shared that information with us without us prompting; the ICO did an initial statement from that which again was really helpful.**

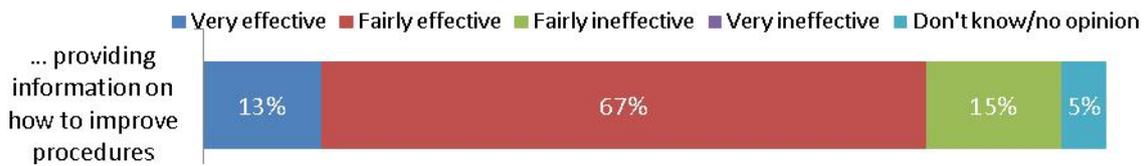
Depth interview, implementation strand

Eight in ten respondents to the telephone survey who handle complaint resolution feel the ICO is effective at providing information on how to improve procedures (80%), a similar proportion (77%) are satisfied with the explanations given of what needs to be done to resolve complaints. Fewer, around half (49%) are satisfied that the ICO supports their organisation in improving information rights processes.

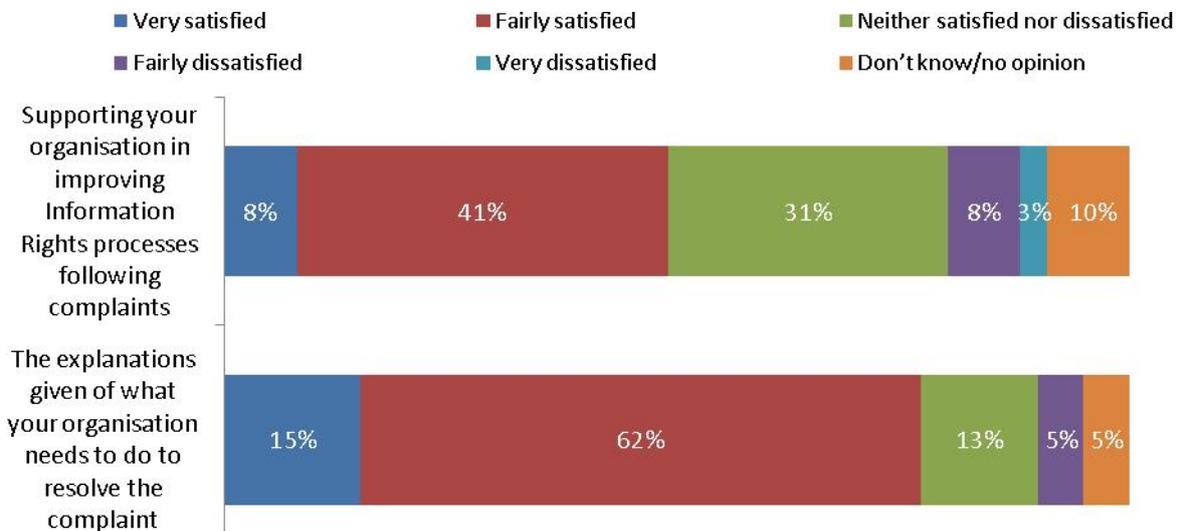
Fig 18

The ICO's supporting information

Q24a. How effective is the ICO in...?



Q23b/c. How satisfied or dissatisfied are you with the following?



Base: All respondents to the telephone survey with complaints resolution role (39)

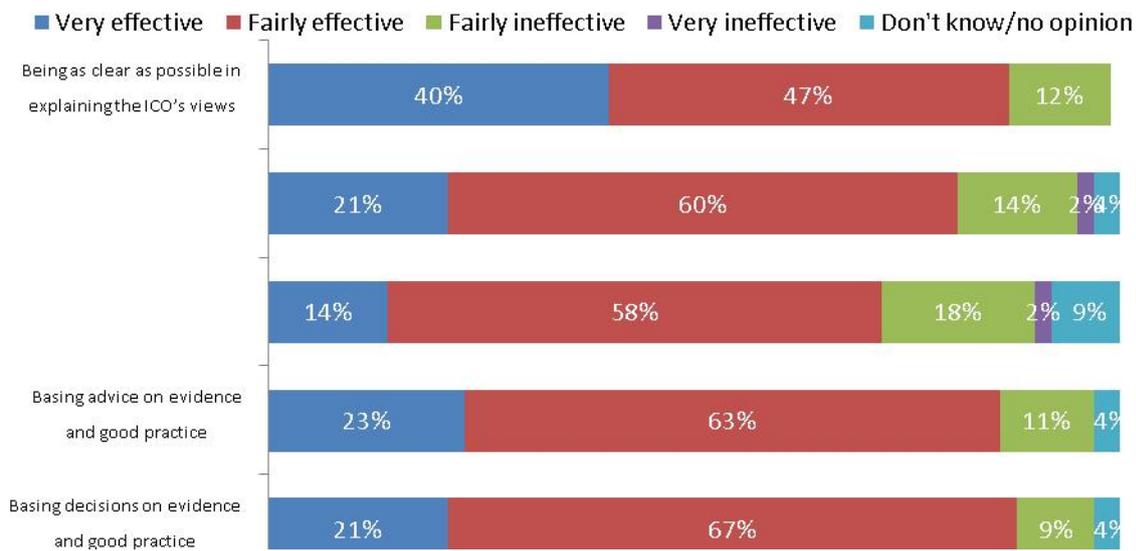
Source: Ipsos MORI

In the telephone survey, stakeholders with an implementation or policy development role are positive about the ICO's advisory role with nearly nine in ten saying the ICO is effective in basing advice (86%) and decisions (88%) on evidence and good practice. A similar proportion (86%) agrees that the ICO is open and transparent about their views on particular issues; and that they are as clear as possible in explaining the ICO's views (88%).

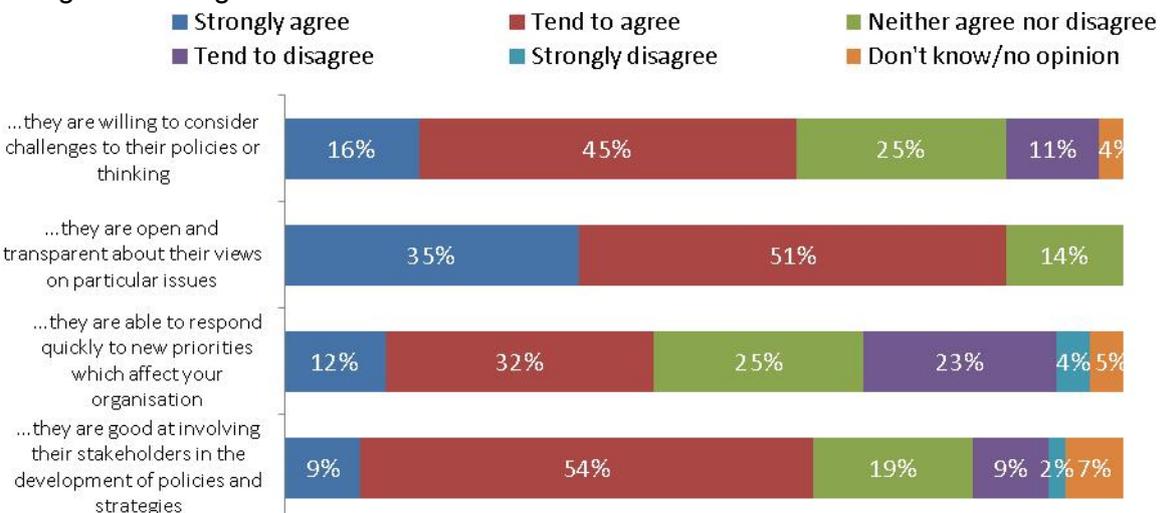
Fig 19

Effectiveness of the ICO's advisory role

Q20. In working with your organisation, how effective or ineffective do you think ICO staff are at the following?



Q19. Thinking about how the ICO engages with you and your organisation, to what extent do you agree or disagree that...?



Base: All respondents to the telephone survey with implementation role (57)

Source: Ipsos MORI

Among respondents to the telephone survey, there are positive views about how well the ICO shares information, solutions, intentions and good practice: eight in ten (81%) agree they share as much as possible and seven in ten (72%) that they do so as early as possible. Fewer, six in ten (61%) agree that the ICO is willing to consider challenges to their policies and thinking. As mentioned earlier, the ICO's willingness to listen to their organisation's views, even if they do not agree, is a valued aspect of the relationship for those who took part in the depth interviews. Depth interview participants also value the ability to call their contact direct when they wish to understand the ICO's view on specific points<sup>4</sup>.

**If it was something that we urgently needed their advice on we would give them a call, and I have done that.**

Depth interview, implementation strand

Six in ten (63%) telephone interview stakeholders with implementation or policy development roles agree that the ICO involves stakeholders in the development of policies and strategies. Fewer still, four in ten (44%) of those with implementation or policy development roles agree that the ICO responds quickly to new priorities. Timeliness of decisions is an issue for one depth interviewee, but the majority are happy that the ICO responds as quickly as they expect/require<sup>5</sup>.

**I don't actually agree that things have improved ... they've traded off quality for quantity ... On the first three or four years of the legislation, they made the decision, and whether we agreed with it or not is not the point, I can actually map back to when they made the decision and you could see why they made that decision. But I think now, because they're maybe rushing or trying to clear backlogs, [or] they're not as good at articulating why they made that decision, sometimes the decision seems slightly rushed. So I think they have improved in timeliness but I think that's been at the expense of the quality.**

Depth interview, implementation strand

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<sup>4</sup> Results shown on Figure 19, page 41

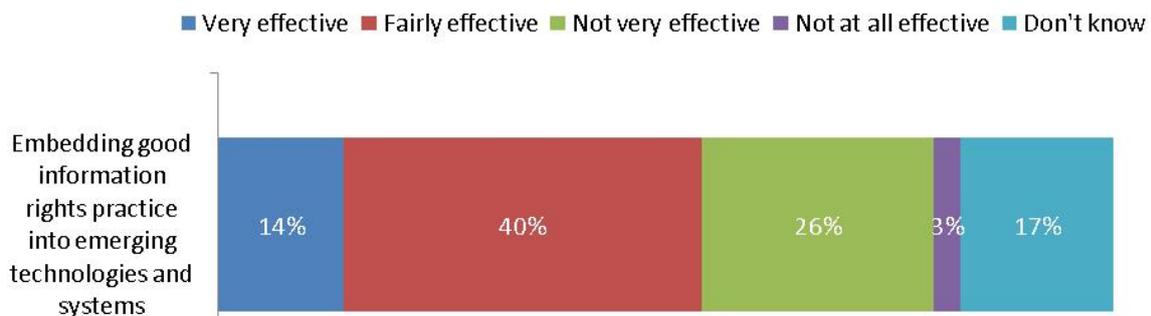
<sup>5</sup> Results shown on Figure 19, page 41

Half of the telephone survey respondents (53%) state the ICO is effective in embedding good practice into emerging technologies; though a significant proportion of implementation/policy development stakeholders say they don't know (26%). For participants in the depth interviews, it was often the timeliness of guidance which is the issue, several expressed the view that they would rather have some "first thoughts" quickly with more considered and complete guidance to follow at a later date than to wait for the formal guidance to be given.

Fig 20

Effectiveness in embedding information rights

Q9c. How effective, if at all, is the ICO at helping your organisation to achieve the following outcomes?



Base: All respondents to the telephone survey (58)

Source: Ipsos MORI

**It would be quite useful to see more guidance from them even like positioning papers, their opinion on a particular issue rather than it being a specific guidance.**

Depth interview, complaint strand

**The ICO came out at a very early stage and said “we expect laptops to be encrypted, that is the absolute minimum that we expect as a control” without necessarily specifying the encryption standard saying they expect them to be encrypted. That sort of direction, that opinion is quite useful because it gives us a clear indication of what they see as being appropriate.**

Depth interview, complaint strand

**The ICO sometimes thinks too long about the advice they give officially and it's like shutting a door after the horse has bolted ... I don't think they always get the balance between getting the guidance 100% right and getting it out in time.**

Depth interview, implementation strand

## The ICO's enforcement role

### Summary

Overall, the ICO is seen as an effective regulator, demonstrating impartiality and proportionality in its decisions. Participants in both the depth interviews and the telephone survey spontaneously mention the ICO's chosen stance on enforcement as being preferable to that of other, European, enforcement bodies. This does not mean they view the ICO as a less effective enforcer, but rather that they value the ICO's willingness to work with their organisations and to take a pragmatic approach to enforcement.

However, enforcement is one area where participants in both the depth interviews and telephone survey would like to see the ICO take a more active role – or at least to publicise their actions more.

**There's only so much hand-holding the regulators can do before they start having to do their more enforcement type role.**

*Depth interview, complaint strand*

Participants in the depth interviews also highlight the potential conflict in the ICO's dual role as both an advisor and enforcer and the resultant impression that the ICO is forced to "sit on the fence" on many issues where participants would like some clear cut guidance.

**There is a difficulty they face in being a regulator in giving direct advice on a matter which they may have to stand in judgement on in the future.**

*Depth interview, implementation strand*

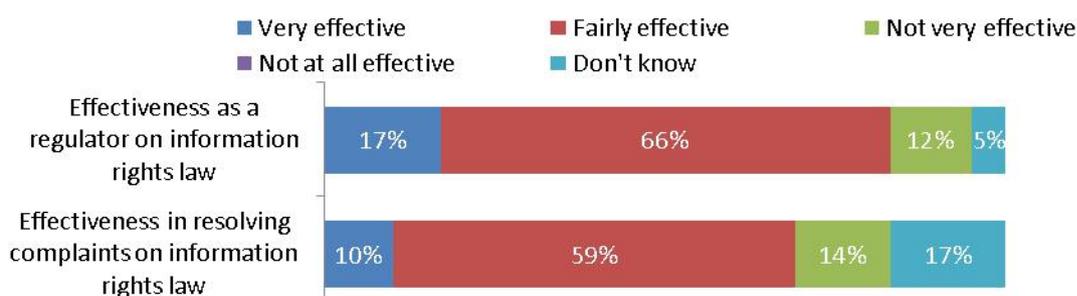
### Overall effectiveness

Eight in ten respondents to the telephone survey (83%) say that the ICO is effective as a regulator, and seven in ten (69%) that it is effective in resolving complaints.

Fig 21

Effectiveness of the ICO in its enforcement role

Q6. The ICO has a number of roles, how effective, if at all, is the ICO in ...?



Base : All respondents to the telephone survey (58)

Source: Ipsos MORI

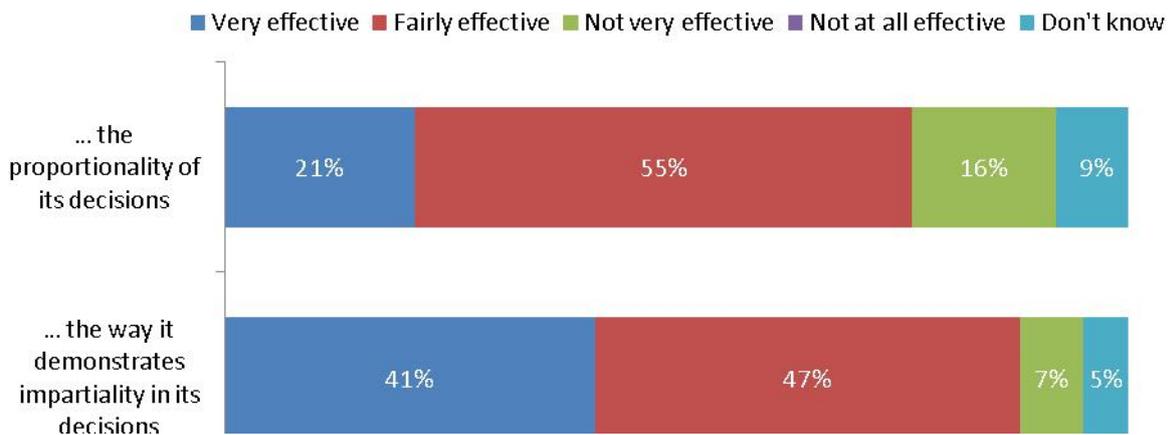
**Elements of effectiveness**

Nine in ten respondents to the telephone survey (88%) say that the ICO is effective in demonstrating impartiality in its decisions and three-quarters (76%) that it is effective in the proportionality of its decisions.

Fig 22

Effectiveness of the ICO's decisions

Q6. The ICO has a number of roles, how effective, if at all, is the ICO in...?



Base: All respondents to the telephone survey (58)

Source: Ipsos MORI

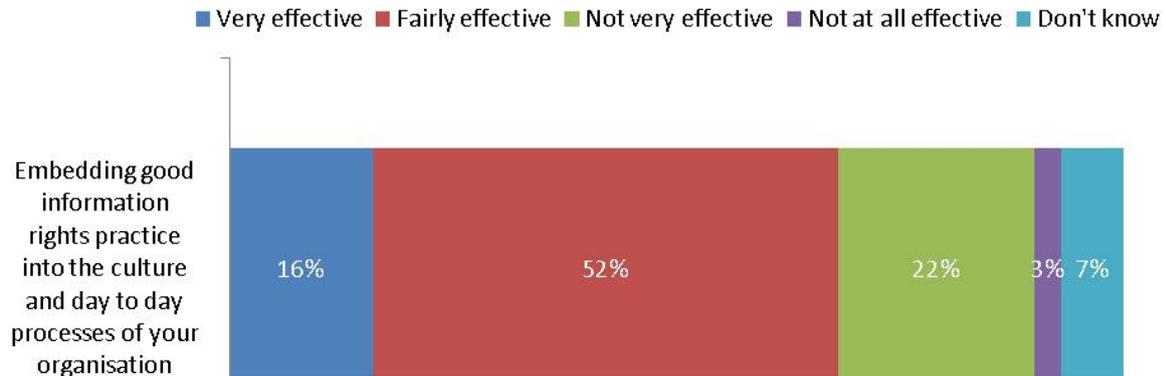
These results are higher among those stakeholders with a dual role; there is a small but significant proportion of implementation/policy development stakeholders who say they do not know about the ICO's effectiveness in these areas (11% and 16% respectively). Lack of awareness among implementation/policy development role stakeholders is especially high with regard to effectiveness in resolving complaints where four in ten (42%) of this group chose the "don't know" option.

A smaller proportion (67%) feel that the ICO is effective in embedding good information rights practice into their organisation's day to day processes.

Fig 23

### Effectiveness in embedding information rights

Q9c. How effective, if at all, is the ICO at helping your organisation to achieve the following outcomes?



Base: All respondents to the telephone survey (58)

Source: Ipsos MORI

Again there is a significant proportion of implementation/policy development stakeholders who say they don't know. This may be explained by comments in the depth interviews where several participants who are otherwise advocates of the ICO and very positive about its effectiveness and role also express the view that the ICO has little influence in how good practice is implemented in their organisations. In these cases they go on to state that their organisation would take compliance very seriously with or without the presence of the ICO – for some stakeholders (such as Equifax or Experian) their whole business model depends on being seen as trustworthy data handlers. In these circumstances it is not surprising that the ICO's influence is lower given the high priority already present in these organisations.

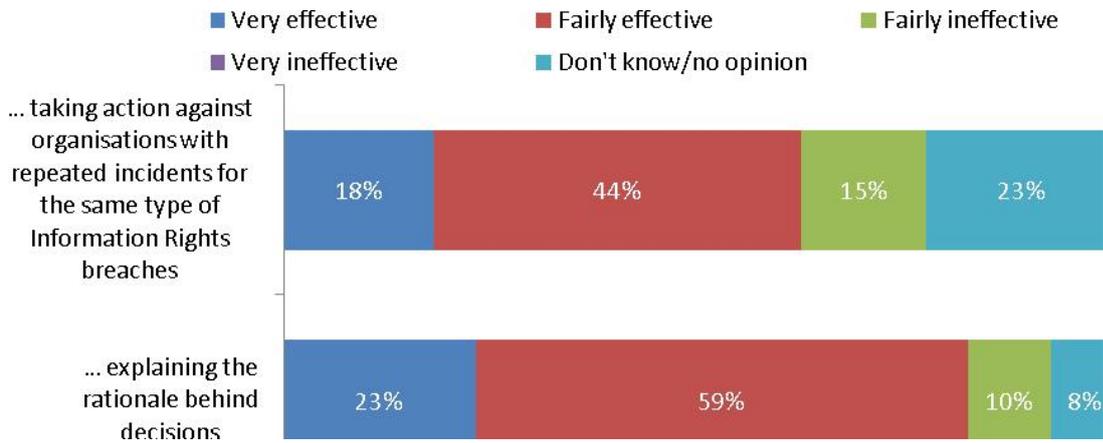
Telephone interview stakeholders with a complaint resolution role were asked about a number of aspects of the ICO's enforcement role, opinions are generally positive:

- Eight in ten (82%) believe the ICO is effective in explaining the rationale behind decisions;
- Three-quarters (77%) are satisfied with their contact with the ICO about resolving complaints;
- Seven in ten (67%) are satisfied with the ICO's process for handling complaints;
- Half are satisfied with the time taken to inform them about complaints received (54%), one in seven (15%) are dissatisfied with the timeliness of notification; and
- Six in ten (62%) believe the ICO is effective in taking action against repeat offenders.

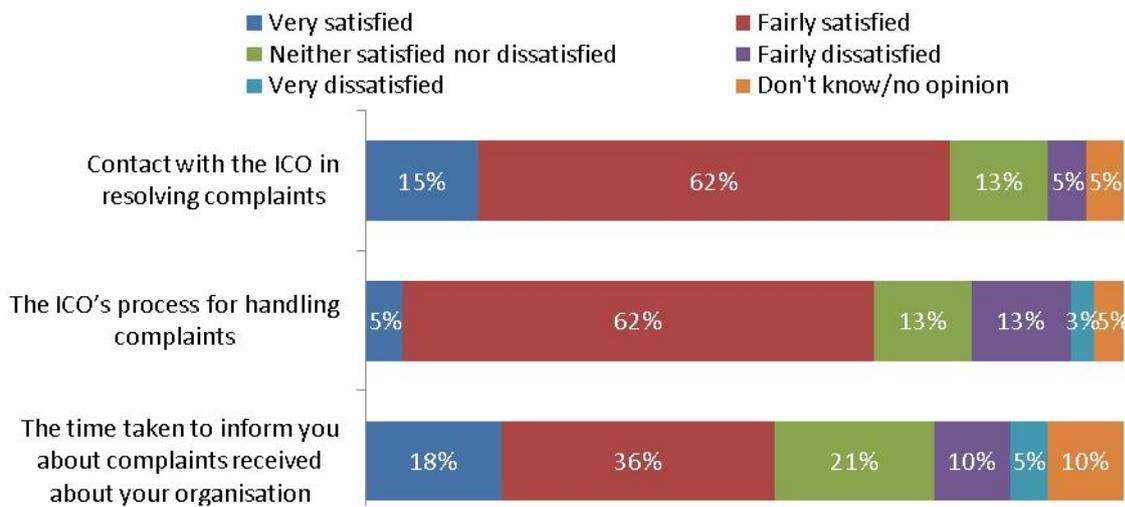
Fig 24

Complaints handling

Q24b/c. How effective is the ICO in...?



Q23a/d/e. How satisfied or dissatisfied are you with the following?



Base: All respondents to the telephone survey with complaints resolution role (39)

Source: Ipsos MORI

## Duality of the ICO's role

One issue which is mentioned in the depth interviews is the inherent difficulty the ICO faces because of its dual role as both advisor and regulator.

**I think their biggest handicap is, maybe sometimes they don't want to formally say something and then be faced with the problem of having to deal with a complaint about it.**

Depth interview, implementation strand

While advice and support are both mentioned as highly valued aspects of the relationship stakeholders have with the ICO this can also be seen as preventing the ICO from being as effective a regulator as it could be.

**Data protection is soft and squishy and that's not much help to anyone and the ICO generally gets stuck in the middle of that.**

Depth Interview, complaint strand

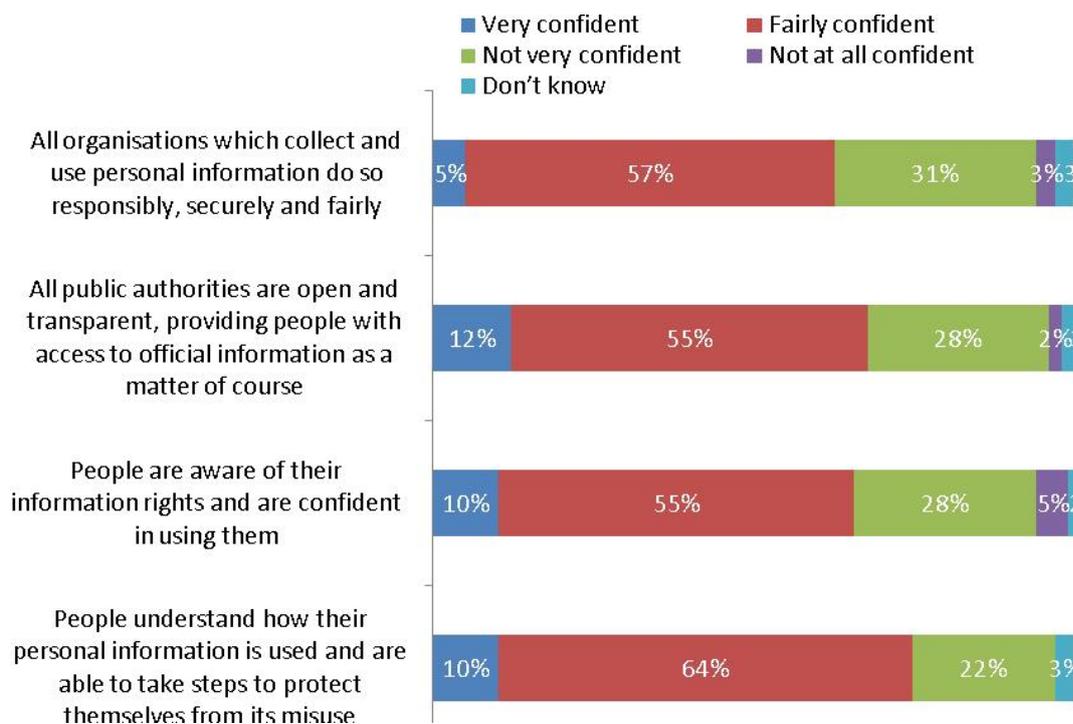
## Confidence in achievement of the ICO’s stated goals

Overall there is measured confidence in the ICO’s ability to achieve its stated goals: although very few respondents in the telephone survey say they are not confident, the majority of stakeholders are fairly confident rather than very confident.

Fig 25

Confidence in the ICO’s ability to achieve its stated goals

Q11. I’m going to read out some of the ICO’s stated goals, looking forward, how confident or not are you in the ICO’s ability to achieve each of these?



Base: All respondents to the telephone survey (58)

Source: Ipsos MORI

There are no differences between implementation/policy stakeholders and dual role stakeholders. Investigations of the small number of respondents saying “don’t know” or “not at all confident” shows that there are no stakeholders who consistently give these responses.



