

# ‘A clear course for changing times’ ICO plan 2015-18

**Version 12**

**16 March 2015**

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.

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Information Commissioner’s Office

## Introduction

### A clear course for changing times



It's my privilege to introduce the ICO's three year corporate plan.

The plan is a conscious continuation of our current strategy. We are holding our course, while responding to the emerging challenges. The refreshed plan has been elaborated by ICO teams, drawing on their experience of responding to developments in the information rights sphere. In the final stages, our thinking has benefited from comments by stakeholders in a public consultation.

The ICO's Better Regulation approach is set out in the strategic outcomes our activities are designed to secure. And our corporate objectives remain unchanged - starting with education and guidance for organisations and individuals; equipping and empowering individual citizens to claim their rights, whether it is under the Data Protection Act and the Privacy and Electronic Communications Regulations, or the Freedom of Information Act and the Environmental Information Regulations; using the picture that emerges from individual complaints and concerns to drive improvements by data controllers and public authorities - and, where that good practice approach is insufficient, deploying our enforcement powers effectively to secure compliance; emphasising the possibilities as much as the prohibitions involved in information rights, with a helpful perspective to contribute with each development of technology or approach; and, above all, making sure that we are able to continue to play our full part by working efficiently and flexibly.

While the ICO's approach to the business of regulating information rights remains unchanged, the business we are charged with regulating is anything but static. Over the next three years, we shall almost certainly have to adapt to a new data protection framework, replacing the 20-year-old Directive. A new General Regulation will apply uniformly across the EU. We expect progress to be made on the final form of the legislation this year - and that means implementation during the life of this corporate plan. At the same time, growing concerns about both privacy and security make information rights a key area of policy - and the business of reconciling sometimes conflicting imperatives an inescapable challenge. And the developments in technology that are making possible ever newer and better products and services in turn present further privacy and security risks.

Similarly, Open Data and Big Data offer both opportunities and threats. Opportunities for the more effective and efficient delivery of services to citizens and consumers; threats to privacy if we do not succeed in managing the new services properly. And transparency and freedom of information are both a help and a hindrance to public bodies - a spur to efficiency, but often a thorn in the side to authority. The ICO has to find the right balance of the public interest - between openness to the outside and necessary frankness inside organisations. If we get the balance wrong there are plenty of politicians who would like to amend the law in a more restrictive direction.

We are setting out a clear course for changing times. But, as any helmsman knows, holding your course in turbulent waters involves judicious tacking to take advantage of the available winds and currents.

The ICO has been undergoing a process of Triennial Review by the Ministry of Justice and the Cabinet Office. In the next few weeks we will know how we did. It's a mark of the significance of the work of the ICO that a record number of stakeholders took part in the review process, responding to the Ministry of Justice's call for comments. We're not afraid of challenge or change.

We stand by to engage positively with whatever administration emerges from the upcoming General Election. Early decisions will be needed on the best way of funding the ICO in the future. We will also need to make progress on reforming pay and benefits at the ICO to bring the office in line with similar regulatory bodies in the North-West where most of our staff are based.

The process of identifying the next Information Commissioner will also need to be put in place without delay if there is to be a seamless handover in June next year.

There is much for this Commissioner to do over the first half of the plan and I'm certainly not letting up. Our sails are set. Our course is clear.

**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 ten strategic outcomes:

1. 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.
2. Development of people's understanding of information rights and risks embedded as an output of the formal education system.
3. Organisations routinely meeting their legal obligations in the way they respond to people exercising their rights.
4. A high level of awareness in organisations of all their wider obligations under information rights law with those obligations routinely met in practice.
5. Good information rights practice embedded into the culture and day-to-day processes of organisations and into emerging technologies and systems.
6. 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.
7. 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.
8. 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.
9. The law, technology and public policy developed and deployed consistently with ICO's goal, but without imposing disproportionate burdens on organisations.
10. The public confident in information rights law as necessary, serving the public interest, effective in practice and properly enforced.

## Our 2015-18 corporate objectives

The achievement of the above strategic outcomes is directly supported by the following corporate objectives (below). The rest of the ICO Plan details how we aim to meet these corporate objectives.

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 over 90%</li> <li>• Answer at least 95% of calls with an average wait of no more than 60s (Anticipating 200k-250k calls)</li> </ul>	<ul style="list-style-type: none"> <li>• Next survey 2015</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> </ul>	<ul style="list-style-type: none"> <li>• Quarterly reporting</li> </ul>
1.3	Providing digital services that help organisations find the information they need and which promote self-education and online transactional services.	<ul style="list-style-type: none"> <li>• Website customer satisfaction 80%</li> <li>• 100% increase in traffic to the website from social media</li> <li>• 12 webinars</li> </ul>	April 2015 to March 2016
1.4	Broadening our communications channels to raise greater awareness of information rights across a greater proportion of the UK and to reach more deeply into niche professional markets.	<ul style="list-style-type: none"> <li>• Analyse stakeholder perception study and annual track survey</li> <li>• Implement recommendations</li> </ul>	<ul style="list-style-type: none"> <li>• Jun 2015</li> <li>• Jun 2016</li> <li>• Dec 2015</li> <li>• Dec 2016</li> </ul>



No	How we will achieve this	Measures	Due dates
		<ul style="list-style-type: none"> <li>• 17,500 twitter followers</li> <li>• ICO social media impact; Klout score up 10% on March 2015</li> </ul>	<ul style="list-style-type: none"> <li>• March 2016</li> <li>• March 2016</li> </ul>
1.5	Developing and implementing media strategies for organisations aimed at highlighting information rights issues and publicising good practice.	<ul style="list-style-type: none"> <li>• Annual Track Survey</li> <li>• Sector page visits up 50% on March 2015</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing to March 2017</li> <li>• March 2016</li> </ul>
1.6	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>• Ongoing through to March 2017</li> <li>• Ongoing</li> </ul>
1.7	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>• DP<sup>1</sup> audit findings</li> <li>• Meeting objectives in Strategic Liaison plan</li> </ul>	<ul style="list-style-type: none"> <li>• Publication of outcomes when appropriate</li> <li>• Progress against plan reviewed Aug 2015 Dec 2015 Apr 2016</li> </ul>

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<sup>1</sup> Data Protection

No	How we will achieve this	Measures	Due dates
1.8	Considering how best to identify and act on opportunities to work with other organisations to extend the reach of our guidance.	<ul style="list-style-type: none"> <li>Meeting objectives in Strategic Liaison plan</li> </ul>	<ul style="list-style-type: none"> <li>Progress against plan reviewed Aug 2015 Dec 2015 Apr 2016</li> </ul>
1.9	Developing and promoting the privacy seal scheme as a means of building the commitment of organisations to good DP practice.	<ul style="list-style-type: none"> <li>Bids to operate initial schemes evaluated</li> <li>First scheme running</li> <li>Meeting objectives in Strategic Liaison Plan</li> </ul>	<ul style="list-style-type: none"> <li>May 2015</li> <li>2016</li> <li>Progress against plan reviewed Aug 2015 Dec 2015 Apr 2016</li> </ul>
1.10	Publishing more information about complaint outcomes to better inform organisations and individuals as to what is being done to meet common concerns.	<ul style="list-style-type: none"> <li>Effective information capture/interpretation</li> <li>Outcomes published</li> <li>Quarterly reports</li> <li>Privacy issues alerts</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing</li> </ul>
1.11	Targeting areas of greatest information rights risk and focusing guidance and advice on these areas		
	<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>Review priority areas</li> <li>PAAG<sup>2</sup> reports</li> <li>Fewer complaints in priority areas</li> </ul>	<ul style="list-style-type: none"> <li>Half yearly at IRC<sup>3</sup></li> <li>Half yearly at IRC</li> <li>Ongoing</li> </ul>

<sup>2</sup> Priority Area Action Groups

<sup>3</sup> Information Rights Committee

No	How we will achieve this	Measures	Due dates
		<ul style="list-style-type: none"> <li>Meeting objectives in Strategic Liaison plan</li> </ul>	<ul style="list-style-type: none"> <li>Progress against plan reviewed Aug 2015 Dec 2015 Apr 2016</li> </ul>
	<ul style="list-style-type: none"> <li>Developing new FOI/EIR<sup>4</sup> guidance following stakeholder consultation and significant Tribunal and Higher Court judgments.</li> </ul>	<ul style="list-style-type: none"> <li>Issuing of guidance</li> </ul>	<ul style="list-style-type: none"> <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>Stakeholder perception study</li> <li>Meeting objectives in Strategic Liaison plan</li> </ul>	<ul style="list-style-type: none"> <li>Progress against plan reviewed Aug 2015 Dec 2015 Apr 2016</li> </ul>
	<ul style="list-style-type: none"> <li>Taking a coordinated approach to promoting proportionate DP compliance in the small and SME<sup>5</sup> sector; using a PAAG to identify and progress work aimed at building knowledge and competencies in the sector.</li> </ul>	<ul style="list-style-type: none"> <li>SME PAAG report</li> <li>Meeting objectives in Strategic Liaison plan</li> </ul>	<ul style="list-style-type: none"> <li>Half yearly at IRC</li> <li>Progress against plan reviewed Aug 2015 Dec 2015 Apr 2016</li> </ul>
	<ul style="list-style-type: none"> <li>Raising awareness of information rights 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 objectives in the NI, Scotland and Wales plans</li> </ul>	<ul style="list-style-type: none"> <li>Progress reviewed quarterly</li> </ul>

<sup>4</sup> Freedom of Information / Environmental Information Regulations

<sup>5</sup> Small and Medium Sized Enterprises

No	How we will achieve this	Measures	Due dates
1.12	Influencing and responding to legislative proposals which extend or impact on information rights and providing guidance to stakeholders on such changes.	<ul style="list-style-type: none"> <li>• Mini project plans for specific proposals</li> <li>• Responding to issues on time</li> <li>• Meeting objectives in Strategic Liaison plan</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing</li> <li>• Ongoing</li> <li>• Progress against plan reviewed Aug 2015 Dec 2015 Apr 2016</li> </ul>
1.13	Developing and promoting the use of DP self assessment as an aid to compliance.	<ul style="list-style-type: none"> <li>• Use of online tool</li> </ul>	Review usage Q3 2015/16
1.14	Developing new guidance on the Re-use of Public Sector Information Regulations.	<ul style="list-style-type: none"> <li>• Guidance published</li> </ul>	July 2015
1.15	Running a conference designed to acknowledge the work of and provide practical assistance to DP practitioners.	<ul style="list-style-type: none"> <li>• Conference held</li> <li>• Positive feedback from participants</li> </ul>	<ul style="list-style-type: none"> <li>• March 2016</li> </ul>
1.16	Developing a proposal to run an FOI practitioners conference.	<ul style="list-style-type: none"> <li>• Consult on proposal</li> </ul>	September 2015

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

No	How we will achieve this	Measures	Due dates
2.1	Improving the compliance of organisations by issuing CMPs <sup>6</sup> for serious breaches of the DP Act and PECRs. <sup>7</sup>	<ul style="list-style-type: none"> <li>• Develop an online self-reported breach tool</li> <li>• Effective tasking and coordination leading to enforcement</li> <li>• No of CMPs issued</li> <li>• Research on effectiveness of CMPs</li> <li>• Arrangements for implementation of revised criteria for CMPs in place</li> </ul>	<ul style="list-style-type: none"> <li>• June 2015</li> <li>• Implemented by Sept 2015; dependent on the passage of necessary legislation</li> </ul>
2.2	Investigating and prosecuting those who commit criminal offences under the DP and FOI Acts, liaising with other investigative and prosecuting authorities as appropriate.	<ul style="list-style-type: none"> <li>• Initiatives with other regulators and prosecuting authorities</li> <li>• Prosecute and administer cautions where appropriate</li> <li>• No of convictions v prosecutions</li> </ul>	Quarterly reporting of outcomes

<sup>6</sup> Civil Monetary Penalties

<sup>7</sup> Privacy and Electronic Communications Regulations

No	How we will achieve this	Measures	Due dates
2.3	Using other DP 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 and no successful</li> </ul>	Half yearly progress report Oct 2015
	<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 required actions 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 Oct 2015
	<ul style="list-style-type: none"> <li>Encouraging organisations to sign up to improvement plans which address information rights compliance issues, backed by formal action when needed.</li> </ul>	<ul style="list-style-type: none"> <li>Targeted follow-ups</li> <li>Review effectiveness of plans</li> <li>90% of recommendations actioned</li> </ul>	Half yearly progress report in Oct 2015
2.4	Improving compliance by issuing CMPs for serious breaches of the PECR, in particular those 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</li> <li>Report on compliance improvements</li> <li>Fewer complaints to the Telephone Preference Service and the ICO about those we have taken action against</li> </ul>	Half yearly progress report in Oct 2015

No	How we will achieve this	Measures	Due dates
2.5	Monitoring how quickly public authorities respond to FOI/EIR requests and addressing poor performance.	<ul style="list-style-type: none"> <li>• Publication of quarterly reports</li> <li>• Annual report on the effectiveness of monitoring</li> </ul>	Reviews at the end of each monitoring period and report at end Q4 2015/16
2.6	Improving compliance with the FOI Act by taking enforcement action against those organisations that fail to improve after the monitoring period.	<ul style="list-style-type: none"> <li>• Issue enforcement notices</li> <li>• Publication of quarterly reports</li> <li>• Annual report on the effectiveness of monitoring</li> </ul>	Reviews at the end of each monitoring period and report at end Q4 2015/16
2.7	Monitoring how quickly data controllers respond to subject access requests; holding data controllers to account and considering enforcement action where appropriate and proportionate.	<ul style="list-style-type: none"> <li>• Introducing a monitoring process</li> <li>• Assessing the effectiveness of the monitoring process</li> <li>• Developing the code of practice</li> </ul>	End Q4 2015/16
2.8	Continue to make use of assessment notice powers and plan for using new powers for non-consensual audits in the health sector.	Programme of health sector audits	April 2015
2.9	Undertake a programme of audits in relation to new responsibilities under the DRIPA <sup>8</sup>	Programme of DRIPA audits	April 2015

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<sup>8</sup> Data Retention and Investigative Powers Act

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

No	How we will achieve this	Measures	Due dates
3.1	Providing an efficient and timely DP 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>Benchmark 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 FOI/EIR complaints handling service that makes proportionate and timely decisions.	<ul style="list-style-type: none"> <li>To keep pace with intake: 90% of cases closed in 6 months</li> </ul>	Quarterly report
3.3	Providing a simple mechanism that enables the public to report their DP and PECR concerns without using third party software.	<ul style="list-style-type: none"> <li>Develop reporting tool for DP concerns</li> <li>Redevelop PECR concern reporting tool in-house</li> </ul>	<ul style="list-style-type: none"> <li>By March 2016</li> <li>By March 2016</li> </ul>
3.4	Responding to appeals against our FOI 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.

No	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>• Annual track research</li> <li>• Press coverage</li> <li>• "For the public" pages on the website</li> <li>• Facebook</li> </ul>	Ongoing
4.2	Working with organisations, including those concerned with children's safety on the internet, to maximise the impact of guidance on how individuals can protect themselves against information rights risks.	<ul style="list-style-type: none"> <li>• Communicating with relevant organisations via LinkedIn, webinars, speaking engagements and meetings</li> <li>• No. and nature of complaints and enquiries</li> </ul>	<ul style="list-style-type: none"> <li>• Progress against the Strategic Liaison plan reviewed Aug 2015 Dec 2015 Apr 2016</li> </ul>
4.3	To better understand public concerns about information rights by working with civil society and other groups, which are representative of those affected by information rights issues, and by using our own research.	<ul style="list-style-type: none"> <li>• Twelve meetings with such groups as in Strategic Liaison plan</li> <li>• Annual Track research</li> </ul>	<ul style="list-style-type: none"> <li>• Progress against plan reviewed Aug 2015 Dec 2015 Apr 2016</li> <li>• Oct 2015</li> </ul>
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>• Follow up research</li> </ul>	<ul style="list-style-type: none"> <li>• 2016</li> </ul>

No	How we will achieve this	Measures	Due dates
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.	<ul style="list-style-type: none"> <li>• Regional press coverage</li> <li>• Search engine ranking</li> <li>• Annual Track research</li> <li>• No of presentations about protected characteristics</li> <li>• No of advisory visits to hard to reach groups</li> <li>• No of people for whom we have made reasonable adjustments</li> <li>• No of stakeholders consulted with and provided guidance to</li> <li>• No of new communities or sections of the society reached</li> </ul>	Review annually in July 2015, 2016 and 2017

No	How we will achieve this	Measures	Due dates
4.6	Running a well-regarded helpline that provides practical and helpful advice to the public.	<ul style="list-style-type: none"> <li>Public customer satisfaction over 90%</li> <li>Answer at least 95% of calls with an average wait of no more than 60 seconds (Anticipating 200k-250k calls)</li> </ul>	<ul style="list-style-type: none"> <li>Next survey 2015</li> <li>Quarterly reporting</li> </ul>
4.7	Publishing more information about complaint and concern 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 2015
4.8	Providing the public with advice about new threats to the security of their personal information (eg viruses) and steps they can take to protect themselves.	Practical and timely advice published on the ICO website.	Within three days of the threat emerging
4.9	Reviewing the nature of the advice we provide for individuals and who it is directed at to ensure we are as effective as possible in helping to protect and empower both adults and children.	Support to Individuals PAAG report	Half yearly at IRC

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

No	How we will achieve this	Measures	Due dates
5.1	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 objectives established and met</li> </ul>	<ul style="list-style-type: none"> <li>• In line with consultation timetables</li> <li>• Quarterly information rights reports to IRC and MB<sup>9</sup> and progress against plan reviewed Aug 2015 Dec 2015 April 2016</li> </ul>
5.2	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 objectives set in Strategic Liaison plan</li> <li>• Opportunities taken to influence and convey ICO views, with these views reflected in outputs from Transparency Boards, Open Data Institute and other bodies</li> </ul>	<ul style="list-style-type: none"> <li>• Progress against plan reviewed Aug 2015 Dec 2015 April 2016</li> <li>• Ongoing</li> </ul>

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<sup>9</sup> Management Board

No	How we will achieve this	Measures	Due dates
5.3	Working with the new Government post May 2015 to ensure that information rights are considered as the legislative programme is developed and that the ICO and the legislation we oversee are seen as enablers of the digital economy.	<ul style="list-style-type: none"> <li>• Programme scrutinised with threats and opportunities identified</li> </ul>	<ul style="list-style-type: none"> <li>• July 2015</li> </ul>
5.4	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 and opportunities</li> <li>• Evidence submitted</li> <li>• Meeting objectives in Strategic Liaison plan</li> </ul>	<ul style="list-style-type: none"> <li>• Specified deadlines met</li> <li>• Ongoing</li> <li>• Progress against plan reviewed Aug 2015 Dec 2015 Apr 2016</li> </ul>
5.5	Keeping alert, responding proportionately and using our powers and influence as appropriate to address the growth in surveillance and the need to reassess safeguards and oversight.	<ul style="list-style-type: none"> <li>• Engagement with the Intelligence and Security Committee and other Parliamentary and related committees</li> <li>• Meeting objectives 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 2015 Dec 2015 Apr 2016</li> </ul>

No	How we will achieve this	Measures	Due dates
5.6	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 offices.	Joint or jointly-badged guidance and conference presentations	Regular meetings
5.7	Using our influence to shape the international information rights landscape in a way that is consistent with the sensible delivery of the information rights outcomes that the ICO is seeking.	<ul style="list-style-type: none"> <li>• Participation in international fora; eg Art 29 WP, OECD, WSPDE and the International Conference of DP Commissioners</li> <li>• Instances where ICO intervention has made a positive difference</li> </ul>	As opportunities arise
5.8	Working with the MOJ <sup>10</sup> , Article 29 Working Party and others to help shape the future European Union DP 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>• Input into the Article 29 Working Party</li> <li>• International Team's contribution to IRC and MB reports</li> <li>• Meeting objectives in Strategic Liaison plan</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing</li> <li>• Quarterly</li> <li>• Progress against plan reviewed Aug 2015 Dec 2015 Apr 2016</li> </ul>

<sup>10</sup> Ministry of Justice

No	How we will achieve this	Measures	Due dates
5.9	Hosting the 2015 Spring Conference of European Data Protection Authorities on the theme of "Data Protection in Practice" and with the title "Navigating the Digital Future – lets get practical"	Successful conference held with the ICO's international study and influence enhanced	May 2015
5.10	Working for greater consistency and coordination in the investigation and enforcement of global DP issues.	<ul style="list-style-type: none"> <li>• Participation in annual international enforcement event</li> <li>• Sentinel information sharing website established</li> <li>• Involvement in the introduction of the GPEN alert tool</li> <li>• Participation in global cross border enforcement co-operation arrangement</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing</li> <li>• June 2015</li> <li>• Ongoing</li> <li>• As soon as notices of intent to participate are invited</li> </ul>
5.11	In light of the speed and impact of technological developments, reviewing how well placed we are to respond to these and considering how we might better assess and address technological risk and build technological capacity into all aspects of our information rights work.	<ul style="list-style-type: none"> <li>• Review complete</li> <li>• Outputs from Emerging Technologies and Applications PAAG</li> </ul>	<ul style="list-style-type: none"> <li>• September 2015</li> <li>• Half yearly report to IRC</li> </ul>
5.12	Implementing a research strategy addressing the information rights agenda.	Research projects to deliver on time to budget	Timescales set for each research project

No	How we will achieve this	Measures	Due dates
5.13	Ensuring that data sharing develops in a way that respects information rights without DP being seen as a barrier to proportionate and beneficial data sharing.	<ul style="list-style-type: none"> <li>• Engagement with those developing significant data sharing plans, and with any plans for legislation</li> <li>• Meeting objectives in Strategic Liaison plan</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing – dependent on opportunities and timetables of others</li> <li>• Progress against plan reviewed Aug 2015 Dec 2015 Apr 2016</li> </ul>
5.14	Continue to press government to commence legislation to scrap the “fine only” regime for the unlawful trade in personal information and to allow courts to consider penalties such as community service orders or prison in the most serious of cases, as the key measure needed to build confidence in digital developments.	Liaison with the MOJ and other relevant departments	Ongoing



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

No	How we will achieve this	Measures	Due dates
6.1	Preparing for substantial change involving: <ul style="list-style-type: none"> <li>• implementing a new EU DP legal framework</li> <li>• developments in FOI/EIR legislation and case law</li> <li>• responding to the results of the Triennial Review</li> <li>• additional statutory responsibilities (eg MiData, and DRIPA).</li> </ul>	Review developments and take appropriate steps	Ongoing
6.2	Working with the MOJ to define future funding arrangements that ensure the long-term stability of the ICO's financial model and which take into account implementation of the new DP regulation	Aiming for proposals that meet ICO aims	Dec 2015
6.3	Improving efficiency particularly in Corporate Support functions, purchasing and third party contracts.	Planning and budgeting for 2015/16 and beyond	March 2016 March 2017 March 2018
6.4	Delivering a range of strategic IT and digital projects aimed at increasing the effectiveness of our case management and records management systems and increase operational efficiency.	See IT project schedules	Completed within agreed timescales and standards
6.5	Building on current training and development so we can add value and deliver business outputs.	Evaluation of learning & development activity	March 2016 March 2017 March 2018
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.	Engagement measures in staff surveys	March 2016 March 2017 March 2018

No	How we will achieve this	Measures	Due dates
6.7	Embedding diversity and our values so that they are an everyday part of how we work and of our decision making.	<ul style="list-style-type: none"> <li>• No of joint diversity focused initiatives with other bodies</li> <li>• No of advisory business outputs from the E&amp;D<sup>11</sup> Committee</li> <li>• No of E&amp;D focused training days</li> <li>• No of E&amp;D concerns identified and considered in the procurement process</li> <li>• Evaluation of departmental E&amp;D activity</li> <li>• Staff survey and performance development reviews</li> <li>• No of information rights concerns identified and referred for further action</li> </ul>	<p>March 2016                      March 2017                      March 2018</p>

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<sup>11</sup> Equality and Diversity

No	How we will achieve this	Measures	Due dates
6.8	Reviewing and improving our 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	March 2016 March 2017 March 2018
	<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	March 2016 March 2017 March 2018
	<ul style="list-style-type: none"> <li>Continuing to embed good information handling behaviours across the ICO.</li> </ul>	Monitoring the results of our refreshed awareness programme	March 2016
6.9	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>Review ICO practice against the Code</li> <li>Required actions taken</li> </ul>	<ul style="list-style-type: none"> <li>Dec 2015</li> <li>In accordance with the agreed plan</li> </ul>
6.10	Contributing to Government targets on sustainability.	Per head year on year reduction in greenhouse gas emissions	Report on performance in Annual Reports
6.11	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 might not otherwise be affordable.	Approach agreed with MOJ	March 2016
6.12	Working with the MOJ to consider changes to our notification fee structure focusing charges more on those organisations that represent the bigger information rights risk.	Research undertaken and proposal prepared	June 2015

No	How we will achieve this	Measures	Due dates
6.13	Developing and finalising new IT service delivery and digital strategies.	Proposals prepared	June 2015
6.14	Developing a people strategy by October 2015: <ul style="list-style-type: none"> <li>• reviewing the competitiveness of pay and grading</li> <li>• recruitment and retention</li> <li>• developing people for senior roles</li> <li>• better ways of working</li> </ul>	<ul style="list-style-type: none"> <li>• Strategy developed</li> <li>• Review completed</li> <li>• Staff engagement survey</li> <li>• Turnover figures</li> <li>• Exit interview results</li> </ul>	<ul style="list-style-type: none"> <li>• Oct 2015</li> <li>• Oct 2015</li> <li>• Sep 2016</li> <li>• Quarterly</li> <li>• Ongoing</li> </ul>
6.15	Managing the orderly changeover of senior leadership including the arrival of a new Commissioner in June 2016.	New senior leadership in post.	Ongoing to 2017

## 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.