

Resource and Infrastructure Strategic Plan

Commissioner's message

We continue to move towards a new frontier for privacy and information rights regulation.

The pace of the digital economy combined with the arrival of a game changing piece of legislation will reshape the data protection landscape.

The forthcoming UK Data Protection Act, the centre piece of a package of data protection reforms, brings a 21st century approach to data protection legislation. It provides greater protections for the public and enhanced obligations for organisations.

And it brings practical change for the regulator too. The new regulatory landscape calls for a more pivotal and complex ICO. Demand for guidance, new and expanded public services and an enhanced international role also mean a larger ICO.

My office needs the right people in the right roles and in sufficient number if I am to fulfil my new regulatory remit. An increased accommodation footprint and greater presence in London is also essential.

I expect to see significant increases in demand for the public services my office provides and at least a 33% growth in the ICO's workforce during the life of this strategic plan. As my office makes the transition from an average sized to a large regulator it must also see a corresponding growth in its digital, communications, customer service and governance infrastructure. And of course, we must ensure adequate funding to underpin our new regulatory role.

This strategic plan therefore sets out the way my office will be resourced and the infrastructure it will have in place to establish the robust foundations essential to provide the UK with a strong and expert privacy and information rights regulator.

A handwritten signature in black ink, appearing to be 'ED', with a long horizontal flourish extending to the right.

Elizabeth Denham
Information Commissioner

Introduction

This four year Resource and Infrastructure Strategic Plan compliments our main Information Rights Strategic Plan and the ICO's mission, vision and strategic goals. It is for those organisations, groups and individuals who need to know how we are planning to meet our obligations to the UK public. It is also for those who want to work with us to achieve our goals. This strategic plan covers the period from October 2017 to September 2021.

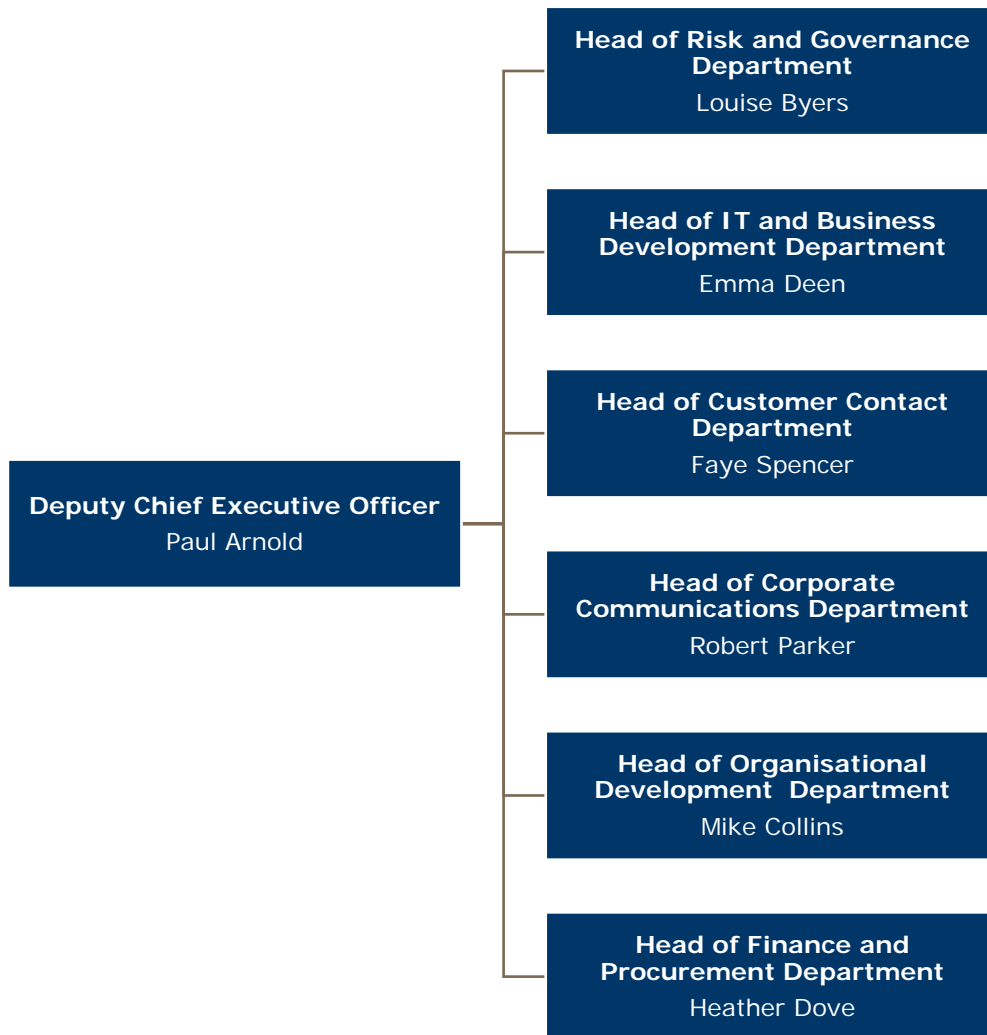
Our strategic plan supports the statutory responsibilities of the Information Commissioner, Elizabeth Denham, and her office to regulate and promote good practice in line with a range of data protection and freedom of information related legislation.

The Commissioner is also expected to be confirmed as the UK's supervisory authority under the package of data protection reforms which apply from May 2018.

Progress against the goals and priorities set out in this strategic plan will be measured and reported annually to Parliament.

The Commissioner allocates specific functions to the directorates and departments which make up the ICO. Primary responsibility for the successful implementation of this strategic plan and achievement of the goals it describes rests with the Deputy Chief Executive Officer's Directorate, which works with leaders and teams across the ICO in line with strategies, business plans and objectives drawn down from this overarching strategic plan.

Deputy Chief Executive Officer's Directorate



Strategic Goals

Goal #1: Have the right people, in the right number, with the right skills in the right roles to achieve our vision.

As our regulatory remit becomes more diverse and complex so too must the capability and capacity of our workforce.

We want to introduce new roles which enable us to remain productive, efficient and effective as our regulatory brief becomes more complex.

We want to maximise the diversity of our workforce whilst attracting people to work for the ICO who already have the skills and experience we need as well as those looking to start their careers with us.

We want to have career paths designed to enable our people to learn and develop to meet the needs of the future ICO.

We want to offer competitive reward and benefits packages to ensure that talented people are able to commit to long term careers with us.

We will measure our progress towards this goal through the measures set out in our People Strategy and associated workforce plans.

To achieve this goal we will prioritise the following actions:

Conduct a pay benchmarking exercise to identify any pay disparity with relevant external labour markets and take all available steps to mitigate recruitment and retention risks.

Conduct a proportionate review of pay systems and grading arrangements across the organisation to make sure we have the right roles with the appropriate remuneration to deliver our plans and objectives as efficiently as possible.

Anticipating a workforce in excess of 600 FTE by April 2020, recruit to fill a range of new managerial and technical roles many of which with particular emphasis on cyber and technology policy and investigation. Recognising the diverse range of new people and skills we seek we also propose to explore a variety of labour markets, including apprenticeships and secondments. We also want to partner with organisations and academic institutions to further our objectives where appropriate.

Continue to grow the learning and development culture within the ICO, fostering coaching, collaboration and knowledge sharing as our default approach to achieving our goals.

Enhance our existing management development programmes and communities of practice in recognition that our managers provide the inspiration and support for our people and our public services.

Goal #2: Ensure that our customers and staff have access to digital and IT services and solutions which are befitting of a modern regulator.

We see digital services and IT solutions as a true enabler of excellent public services and an efficient and effective workforce.

We want to provide our customers and stakeholders with digital services which are so good they prefer to use them, whilst retaining choice and support for those who need or prefer to contact us in other ways.

We want to provide our staff with technology to help them work efficiently anywhere and at any time, accessing the information they need securely and being able to collaborate quickly and creatively with colleagues regardless of location.

We want to provide our digital and IT services in ways which improve productivity and efficiency and represent value for money, ensuring end to end solutions remain secure whilst enabling innovative and smart ways of working across a diverse range of public services and for a workforce with diverse needs.

We will measure our progress towards this goal through the measures in our Digital and ICT strategy which seeks to ensure our technology is used to maximise productivity and unlock new capacity across our business.

To achieve this goal we will prioritise the following actions:

Take advantage of secure commercial 'cloud' based services where our privacy and security impact assessments confirm it is appropriate to do so. Using common technology solutions in this way increases our opportunity to develop our capacity and capability through the technology we use and provide.

We will prioritise the development of new technology which best aids and improves efficiency and productivity, routinely measuring and reporting progress in the context of ICO corporate objectives and goals.

We will continue to adopt our 'digital by default' approach to public services, building on our success to date when providing the public with genuine choice in the way they contact us and tell us things.

We will enable our people to work efficiently when they need to, where they need to and in ways which help them manage their ever more complex workloads.

We will use communications technology to break down physical barriers and enable our people to work collaboratively at all times.

Goal #3: To ensure the ICO is adequately funded to achieve its objectives and that the UK receives value for investment in its privacy and information rights regulator.

We need to fund the expansion of the ICO's services and workforce to meet an ever more complex remit.

We want to do this through a funding model which ensures we receive adequate Grant in Aid from Government for our non-data protection related work and that our data protection work is adequately funded through the fees paid by those we regulate.

We want to make sure the payment of fees to the ICO is as quick and efficient as possible, actively pursuing those who fail to pay fees to ensure fee levels can be kept as low as possible for all compliant data controllers.

We will measure our progress towards this goal through the measures set out in our Finance business plan and through our Corporate Governance framework, both of which are in place to ensure financial propriety and robust forecasting and planning at all times.

To achieve this goal we will prioritise the following actions:

To support DCMS to ensure new fee regulations are in place by May 2018 to underpin our future funding model, publishing guidance for those we regulate at the earliest possible opportunity.

Introduce the new systems and services to support the efficient collection of our new fees from May 2018.

Ensure that we have adequate resources to identify those needing to pay fees and to pursue and impose proportionate penalties on those refusing to comply.

Particularly as the ICO expands in the years immediately following the implementation of the GDPR and Data Protection

Act 2018, implement financial forecasting and planning processes to ensure any potential increase or decrease to fee levels can be implemented in a timely manner and with minimal risk to ICO funding and business plans.

Continue to review the Grant in Aid received for our non-data protection related work, making the case for adequate funding of these critical components of the UK's information rights regulatory framework as appropriate.

Goal #4: To ensure ICO staff have an agile and smart working environment with the capacity to support a modern and growing workforce.

As well as enabling flexible working from any place and at any time we want to make sure we have sufficient office space as a base from where our staff can collaborate effectively and provide excellent public services.

We want to make sure we derive maximum benefit of having offices in all UK capital cities as well as our Head Office in Wilmslow, Cheshire.

We will measure our success towards this goal by maintaining a healthy agile people to workspace ratio and monitoring satisfaction with our working environment through our staff surveys.

To achieve this goal we will prioritise the following actions:

By April 2018 we will increase our Head Office accommodation footprint so that it is large enough to serve as an agile base for approximately 625 staff in line with expectations during the life of this strategic plan.

We will ensure our regional offices and accommodation in London remain fit for purpose and flexible enough to support expansion in these areas as may be necessary.

We will ready ourselves for a major review of our accommodation needs in 2020 ahead of break points in our main leases and the anticipated introduction of new Government Hubs.

We will review all accommodation to ensure it continues to support smart and agile working practices to both make best use of our available space as well as to attract and retain a modern and dynamic workforce.

Goal #5: To ensure appropriate and proportionate communications mechanisms and systems are in place to support an expanded ICO.

As our regulatory remit and workforce expand we must ensure that our communication infrastructure develops so that journalists and other stakeholders can engage with us in ways they find helpful.

We want to engage with stakeholders through relevant channels which keep pace with the development of media and social media platforms.

We want to make sure that our growing workforce is able to collaborate effectively and have access to the information it needs.

We will measure our progress towards this goal through our annual track, stakeholder satisfaction research and our staff surveys.

To achieve this goal we will prioritise the following actions:

We will review the way we resource our internal and external communications function to ensure we have the right proportion of technical specialist roles.

We will enhance and expand our knowledge management systems in support of more dynamic engagement and collaboration across the ICO.

We will enhance our external communications systems and services to support the need for collaboration with our regulatory partners and engagement with journalists and other stakeholders at any time and particularly in response to major regulatory incidents.

Goal #6: To maintain and develop appropriate and proportionate customer contact systems and services to support an ICO which places customers at the centre of its business.

We are here to serve the public and be an enabler to all sectors of the economy.

We want all our stakeholders to be able to contact us in ways which are helpful and meaningful and which give them access to the information they need at the earliest possible opportunity.

We want our digital services to support self-service wherever it is helpful to do so.

We want our people to be motivated by the help they are able to give our customers and recognised for the high quality service they provide.

We will measure our progress towards this goal through the measures set out in our Customer Contact Business Plan and the projects in place to maintain and develop our customer service culture.

To achieve this goal we will prioritise the following actions:

We will enhance and upgrade our customer contact technology to streamline services and maintain high levels of customer satisfaction as demand increases, taking the opportunity to give particular emphasis to the way advice is provided to SMEs in the critical build up and post GDPR implementation.

We will continue with initiatives to minimise avoidable customer contacts and provide each of our customers with as much of the information they need at their first point of contact with us.

We will review our service hours making sure we remain able to respond to demand in ways our customers and stakeholders need and appreciate.

We will refocus our Notification and Registration services as the need for data controllers to 'notify' the Commissioner is replaced by the need to pay a Data Protection Fee to the regulator.

Goal #7: To ensure, as our organisation expands, we retain proportionate and appropriate mechanisms to

manage risk and govern the work of the ICO in line with standards expected of a modern independent regulator.

We want to make sure that as our regulatory remit becomes more complex we are able to manage risk and take advantage of new opportunities in line with our corporate appetite for risk.

We want to ensure that, as Corporation Sole, the Information Commissioner maintains independence to ensure the adequate resourcing of her office as the UK's independent privacy and information rights regulator.

We want to maintain a clear accountability framework, with a Data Protection Officer with sufficient autonomy, resources, access and expertise to promote a positive culture for personal information handling across our organisation.

We want our corporate information to be created, stored and retained in a secure and accessible way to support the effective delivery of our services.

We want transformation projects to be delivered consistently and in an engaging manner to make sure our corporate objectives are achieved effectively.

We will measure our progress towards this goal through the measures set out in our Risk and Governance Business Plan and the projects in place to deliver better governance and information management.

To achieve this goal we will prioritise the following actions:

We will identify, manage and respond to risks and opportunities in our delivery of our corporate objectives. Our risk framework will assist in the management of our risks and opportunities in the achievement of our goals.

We will maintain a strong relationship with the Department for Digital, Culture, Media and Sport (DCMS) on all matters pertaining to the ICO's sponsorship and the Information Commissioner's role as Accounting Officer. We will ensure a responsible balance is maintained between the

ICO's role as independent supervisory authority and the need, as a public sector body, to maintain standards of propriety and integrity when spending public funds and managing public money.

We will deliver an effective and efficient Private Office and Corporate Governance function, providing strong support to the decision making structures at the ICO by making sure they are well briefed and can make appropriate decisions with the right information at the right time.

We will deliver a compliant, efficient, and accessible information access service and make our corporate information as transparent as possible through the proactive disclosure of appropriate information.

Our information management service will enable us to get best value throughout the lifecycle of our information assets and to provide clear advice on information management aspects of projects and innovations across the business.

We will work to make sure that we implement proportionate and risk based information security policies and processes, working closely across departments at the ICO to promote good data handling through proactive engagement and monitoring.

We will manage projects in an agile way to make sure they deliver against agreed goals, recognise the dependencies on and with other projects and communicate their work throughout the ICO.