



<b>Meeting</b>	Executive Team	<b>Date</b>	Monday 19 September 2011
<b>Paper title</b>	Planning for 2012/13 and beyond		
<b>Agenda item</b>	4	<b>Discussion time</b>	20 minutes
<b>Purpose of paper</b>	Discussion and information		
<b>Restrictions on public access including staff</b>	Restrictions?		N
	If "Y" please give the reason for the restriction below.		
<b>Presenter</b>	Peter Bloomfield		
<b>ET sponsor</b>	Christopher Graham		
<b>Corporate Plan aim</b>	8.3 – improving our corporate governance so it becomes embedded in the ICO culture.		
<b>Summary</b>	At the meeting on 12 September there was brief discussion of the planning arrangements for 2012/13 and beyond. Further discussion was asked for.		
<b>Who has been consulted?</b>	Not relevant.		

## **Planning for 2012/13 and beyond**

### **Introduction / Aim of the paper**

1. This paper brings to Executive Team the suggested timetable for planning for next year and beyond, along with a mock up of a combined Corporate and Business plan (The ICO Plan 2012-2015). These were first provided at the meeting on the 12 September. Further discussion was asked for.

### **Decisions needed and recommendations made**

2. Executive Team is asked for comments on the proposals and to confirm that the direction taken is right.

### **Background**

#### Timetable (annex A)

3. In terms of the timetable my assumptions were that:
  - we were going to start with an agreed top down budget quite early on which would allow us to start the planning round earlier than normal and allow us to have a straw man for Management Board to discuss late in November;
  - we would aim to get a draft to the MOJ by Christmas as usual. The new Framework Agreement will not stipulate this specifically but it is a good discipline;
  - we should seek to keep trade unions informed and encourage on-going discussion of plans albeit with a more formal consultation in parallel with that for the Ministry of Justice (MOJ);
  - there would be a short stakeholder consultation on the plan in February; and
  - there is a planning session for heads of and direct reports in December to help spot overlaps and gaps and firm up on objectives.

#### Format (annex B)

4. The format of the combined corporate and business plan arose out of sight of the TNA Business Plan (attached – annex D).
5. The advantages of a combined plan are:
  - The golden thread from corporate aim to individual objective is clear. Currently the business plan and corporate plans are not structured in the same way so it is difficult to read across from one document to the other. Specifically linking the

objectives with aims in one document means that the link is clear and gaps and duplication are easy to spot.

- It should be easier to focus on what the ICO has to do and to report on progress. This arises because the combined plan will be shorter than the current business plan, and we will be moving away from a business plan based on directorates and departments. The aims and objectives will represent ICO's priorities rather than those of directorates and departments.
- It will be easier to plan for periods longer than a year; the format can accommodate objectives which go across years.

### The Golden Thread

6. Concern was expressed at the meeting on 12 September that the proposed structure of the ICO Plan did not allow support services to show what they were doing to contribute. There was the suggestion that we add another section, possibly entitled "efficiency".
7. My view is that it should be possible for a link to be made between the more outward facing corporate aims we identify under enforcing, enabling, engaging, educating and empowerment, and the work support services do. It is also worth remembering that this is a corporate level planning process and not a directorate or departmental one. There will be more detailed directorate and departmental plans underlying this ICO Plan. This plan should be about the ICO's priorities.
8. For information Sue Fox's golden thread document is at annex C.

### Options considered

9. Retaining the current structure of the Corporate Plan and having a separate business plan based on directorate / departments does not seem to be an option.

### Risks and opportunities

10. There are risks in continually changing the planning process. However the planning process has evolved continually over the years and changing it presents opportunities to make it work better.

### Financial issues

11. There are no financial issues.

Staffing issues

12. In terms of staff time it should be easier to develop one plan rather than two.

Devolved office issues

13. There are no devolved office issues.

Accommodation issues

14. There are no accommodation issues.

Environmental issues

15. There are no environmental issues.

Privacy issues

16. There are no privacy issues.

Equality and diversity issues

17. There are no equality and diversity issues.

**Conclusion**

18. There is an opportunity this year for the ICO to get ahead on its planning and to pull together a simpler plan for the years ahead which clearly links aims with objectives at a corporate level, and allows better monitoring and accountability.

**Annexes**

- Annex A Draft planning timetable  
Annex B Mock up of ICO Plan  
Annex C Golden thread document  
Annex D TNA Business Plan

Peter Bloomfield  
Senior Corporate Governance Manager  
Tuesday 13 September 2011

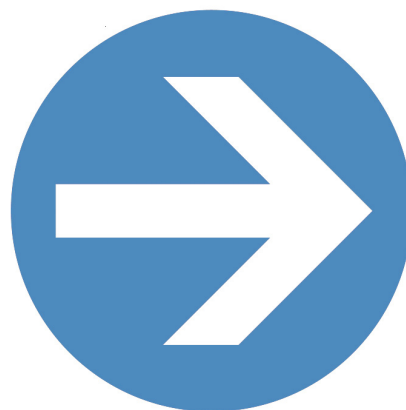
**Planning Timetable 2012/15**

Month	October	November	December	January	February	March
Budget	Budget v1 to ET (3 <sup>rd</sup> ) and then to direct reports and TUS	Quarterly MB discussion of budget v1 (7 <sup>th</sup> )  Discussion and testing of budget at MB Strategy Day 28 <sup>th</sup>	Budget v2 developed after MB Strategy Day  Budget v2 to MOJ and TUS by 31 <sup>st</sup>	Consultation with MOJ and TUS  Deadline 31 <sup>st</sup>	Budget v3 developed after consultation	Budget finalised by 31 <sup>st</sup>
Corporate / Business Plan	Initial consideration of aims and objectives by ET and direct reports - after ET on 3 <sup>rd</sup> - with further discussion at ET on 17 <sup>th</sup>  Development of the Plan v1.	Discussion and testing the plan v1 at MB Strategy Day 28 <sup>th</sup>	Planning event for direct reports  Plan v2 developed  Plan v2 to MOJ by 31 <sup>st</sup>	Consultation with MOJ and TUS  Deadline 31 <sup>st</sup>	Corporate / Business Plan v2 developed  Consultation with stakeholders and staff early Feb	Deadline consultation early March.  Corporate / Business Plan finalised by 31 <sup>st</sup>

Unclassified

# Upholding information rights

## The ICO Plan 2012-15



# 1. Introduction

**Christopher Graham**  
Information Commissioner



## 2. Our mission, vision and values

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

### Our vision

We will 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 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 productively and efficiently to produce high quality and timely outcomes, offering best value for customers and citizens.

#### 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 perspectives and needs of all our stakeholders – and to the potential impact of new developments in our business.

#### 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.

## 3. The ICO way

**Enforce**

**Enable**

**Engage**

**Educate**

**Empower**

## 4. Enforce

No	Aim (what we want to happen)	Objective (how we will make it happen)	Due	Milestones (in support of objectives)	Due
1	Ensure that organisations processing personal data know about, and understand, their duty to notify, and that they do not deliberately evade this duty.	Identify under notified sectors and target relevant trade bodies to assist in providing guidance.		<ul style="list-style-type: none"> <li>Identify under notified sectors</li> <li>Liaison with relevant trade bodies</li> <li>Evaluate success of the operation</li> </ul>	
		Seek to ensure that organisations pay the correct registration fee.		<ul style="list-style-type: none"> <li>Set up monthly audit of payments made.</li> <li>Review results of audit</li> <li>Re-design procedures for checking fees paid if necessary</li> </ul>	
2	Ensure that organisations meet their responsibilities under information rights legislation in respect of individual rights (eg of access, security etc).	Issue enforcement notices against organisations which repeatedly fail to meet their information rights responsibilities.		<ul style="list-style-type: none"> <li>Monitor compliance</li> <li>Issue enforcement notices in cases which reach the trigger points</li> <li>Publicise enforcement notices</li> </ul>	

No	Aim (what we want to happen)	Objective (how we will make it happen)	Due	Milestones (in support of objectives)	Due
		Apply the new data protection civil monetary penalties regime robustly and consistently when organisations repeatedly fail to meet their data protection responsibilities.		<ul style="list-style-type: none"> <li>• Agree policy and procedure</li> <li>• Set up group to monitor first set of penalties</li> <li>• Issue first set of penalties.</li> <li>• Review performance.</li> </ul>	
		Target information rights priorities (as identified by the IRC) for specific action to improve compliance in an effective way		<ul style="list-style-type: none"> <li>• Review information rights priorities and action plans from groups</li> <li>• Update action plans and implement</li> </ul>	

## 5. Enable

No	Aim	Objective	Due	Milestones	Due
1	Help citizens use social media safely.	Improve online information about settings in social media relating to access and security.		Talk to Facebook, Twitter etc  Identify areas for improvement and agree actions with the sector  Monitor compliance	
2	Help citizens help themselves by providing them with a clear and quick view as to whether or not their rights have been infringed and what they can do about it	Clear complaints made to the ICO as quickly as possible – x% within y months etc.			
		Write guidance on what citizens can do for themselves and provide this in a targeted way			
3	Support those responsible for information rights compliance get improved compliance out of their organisations.	Hold an annual DPO conference		Milestones from the project plan.	
		Development of DPO specific guidance.			

## 6. Engage

No	Aim	Objective	Due	Milestones	Due
1	To have a clear, proportionate and practical legal framework for data protection legislation	Contribute to the debate on the EU Data Protection Directive due to be agreed by xxx			
2	Improve our understanding of the expectations of those whose information rights we are protecting so as to respond better to significant public concerns.	Ensure arrangements for getting input from citizens on their views on information rights are working		Review.	
		Annual track survey		Implementation of new arrangements	
3	Influence policy makers and key stakeholders to consider information rights at an early stage in policy and system development.	Launch new Stakeholder Engagement strategy			
		Encourage greater use of Privacy Impact Assessments			
		Engagement with Gov transparency agenda			
4	Improve relations with and the service provided to the press	Develop online resources and social media opportunities for the provision of pictures, audio and video etc.		Research needs Agree action plan Implement action plan	

## 7. Educate

No	Aim	Objective	Due	Milestones	Due
1	Improve data protection compliance by data controllers via the ICO's audit programme and the publicising of lessons learnt from audits to all data controllers.	Implement an increased audit programme.		<ul style="list-style-type: none"> <li>Recruit new audit team</li> <li>Agree audit programme</li> <li>xxx audits done</li> </ul>	
		Publicise the result of audits in a way which will encourage other data controllers to comply.		<ul style="list-style-type: none"> <li>Consider audit results</li> <li>Communication plan agreed.</li> <li>Communication plan implemented.</li> </ul>	
2	Improve young people's awareness of information rights and the steps they can take to protect their personal information.	Build in information rights into the national curriculum.		<ul style="list-style-type: none"> <li>Research complete.</li> <li>Action plan agreed.</li> <li>Implemented plan</li> </ul>	
		Run a campaign to raise awareness of information rights and social media.			
3	Provide an exemplar for other organisations in respect of compliance with information rights legislation	Provide responses to x% of information requests within statutory time limits			
		Complete x% of reviews within y days			
		Embed best practice in information management			

No	Aim	Objective	Due	Milestones	Due
4	Provide case studies as an example to organisations as to how things can go wrong, and the right way of doing things.	Case studies to be published on the website	?	Set up project group  Commission case studies  Finalise case studies	



## 8. Empower

No	Aim	Objective	Due	Milestones	Due
1	Provide a more efficient and effective notification process including on-line notification and fee payment, which also provides a better means of targeting and supporting data controllers in their compliance with information rights.	Implement on line payment and notification systems	12/13	Online payment of notification fee  Implementation of new ICE system to replace DUIS  Completion of implementation of new ICE system	October 2011  April 2012  ?
2		Consider ways of using ICE to improve direct communication with data controllers			



# The golden thread – ICO corporate planning process

Susan Fox, Director of Corporate Affairs

FINAL

Meridio 1.15.02 Cross-office projects/Corporate governance review

27 September 2010 - Updated 21/10/10 following ET comments and agreed by MB

## 1 Overview

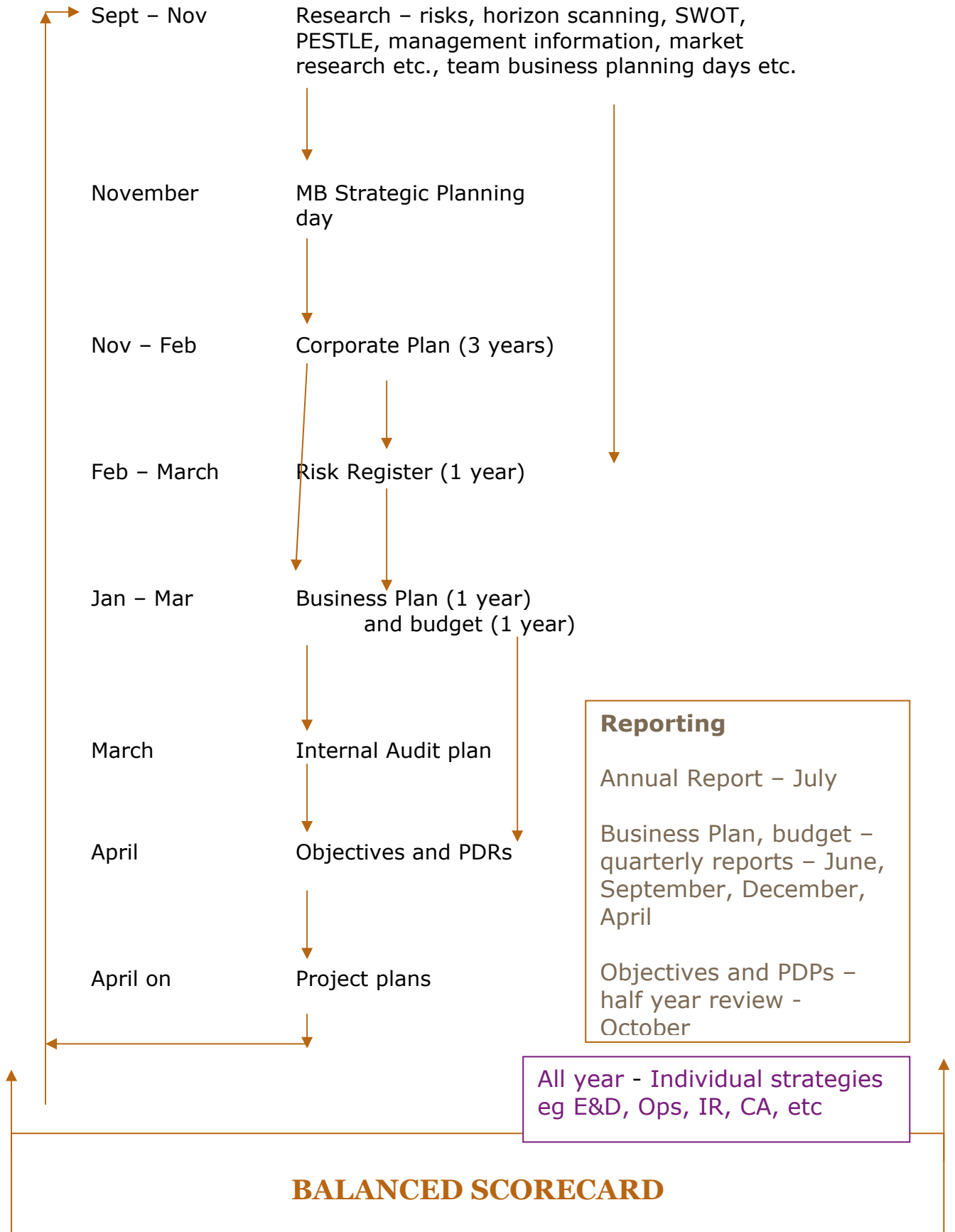
- In our values we say we want to be:
  - focused (giving priority to activities that make the biggest contribution to achieving our mission)
  - effective (working productively and efficiently)
  - alert (to the needs of our stakeholders and to impacts of new business developments).
- We have the component parts of a good corporate planning process which will help us to live these values – eg corporate plan, business plan, budget, risk register, internal audit, personal objectives and regular reporting.
- However, they don't always integrate into one smooth process. We have an opportunity to streamline our corporate and business planning process so that all components are aligned in one golden thread, clearly contributing to the Corporate Plan.
- This will help the ICO to work in a more efficient and effective way. We will not only be ticking the boxes of good practice, but understanding them, embedding them and modelling them.
- This document shows how the component parts fit in, and suggests improvements to make the whole more streamlined and integrated.

### **Recommendations**

#### **ET is asked to:**

- Endorse the golden thread approach
- Agree the recommended changes
- Actively support the process as it runs through the year by meeting deadlines, taking agreed actions, briefing staff etc.

## 2 The golden thread





- Stick to the agreed timetable and deadlines

The aim is to ensure that our corporate planning process becomes less of a tick box exercise and something we embed into everyday business management – how we operate around here.

Component	Research for Corporate Plan
Standard characteristics	<ul style="list-style-type: none"> <li>• Explore risks, horizon scan and generate ideas</li> <li>• Informed by market research, management information</li> <li>• Use techniques such as SWOT and PESTLE</li> </ul>
Owner	Sue Fox supported by Corporate Governance
Desired improvements	<ul style="list-style-type: none"> <li>• Better enable creative thinking</li> <li>• Get the best from MB members</li> <li>• Involve staff more and consult unions</li> <li>• Make better use of available intelligence</li> </ul>
Actions	<ul style="list-style-type: none"> <li>• Bring input from directorates to the MB corporate planning day (ET)</li> <li>• Commission and use management information to show trends for risks, issues, work volumes and the topics of complaints and enquiries (Corp Gov to identify, ET to supply)</li> <li>• Assess current risk register (Corp Gov)</li> </ul>

Component	Corporate Plan
Standard characteristics	<ul style="list-style-type: none"> <li>• Three year plan</li> <li>• Outward-looking: demonstrates the benefits to society</li> <li>• Shows the what, how and when - big picture, not detail</li> <li>• Consulted on internally and externally</li> <li>• Progress reported in Annual Report</li> </ul>
Owner	Christopher Graham supported by Corporate Governance
Desired improvements	<ul style="list-style-type: none"> <li>• Show outcomes for society / citizens with evidence</li> <li>• SMART objectives (internal audit recommendation 2009/10 05)</li> <li>• Involve staff more and consult unions</li> <li>• Structure by theme or outcome</li> </ul>
Actions	<ul style="list-style-type: none"> <li>• Agree on structure / themes (Christopher Graham)</li> <li>• Agree corporate aims as SMART outcomes to society (Christopher Graham)</li> <li>• Agree our narrative – what story are we telling? (Christopher Graham)</li> <li>• Put the Plan on the Joint Committee agenda (Corporate Governance)</li> </ul>

Component	Risk register
Standard characteristics	<ul style="list-style-type: none"> <li>• Identification and assessment of risks and responses</li> <li>• Related to corporate plan / objectives</li> <li>• Understanding of the organisation's appetite for risk</li> </ul>
Owner	Sue Fox supported by Corporate Governance
Desired improvements	<ul style="list-style-type: none"> <li>• Ownership among ET</li> <li>• Embed it in ICO culture</li> <li>• Understand our risk appetite</li> <li>• Involve and educate staff, consult with unions</li> </ul>
Actions	<ul style="list-style-type: none"> <li>• Discuss our risk appetite at MB (Corp Gov)</li> <li>• Review risk regularly at ET (Corp Gov to facilitate)</li> <li>• Set up a cross-office staff team to review risk annually</li> </ul>

	<p>(Corp Gov)</p> <ul style="list-style-type: none"> <li>• All strategies to have risk sections; those directorates without strategies to have risk registers (Corp Gov/ET);</li> <li>• Projects to have a risk register (IT via project documentation)</li> <li>• Corporate committees to consider risk and feed into risk register as part of terms of reference (internal audit recommendation 2008/09 02 and 2009/10 02) (Corp Gov).</li> <li>• Build risk education into management training (internal audit recommendation 2009/10 03) (L&amp;D)</li> <li>• Transfer mitigating actions from risk register to business plans/personal objectives (ET to do, Corp Gov to facilitate)</li> </ul>
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<b>Component</b>	<b>Internal audit plan</b>
<b>Standard characteristics</b>	<ul style="list-style-type: none"> <li>• Benchmarked against the Good Governance Standards for Public Services, the Government Internal Audit Standards and the Treasury's Audit Committee handbook</li> <li>• One year internal audit plan</li> <li>• Based on risk register and Corporate Plan</li> </ul>
<b>Owner</b>	Sue Fox for Audit Committee Chair (Neil Masom) supported by Corporate Governance
<b>Desired improvements</b>	<ul style="list-style-type: none"> <li>• Improved communication with ET and staff about internal audit programme and outcomes</li> <li>• Make explicit links between the risk register and the Corporate Plan</li> <li>• Complete internal audit recommendations more quickly</li> </ul>
<b>Actions</b>	<ul style="list-style-type: none"> <li>• Agree Audit programme in March so it is informed by year end figures (where possible), business plans, budget and Corporate Plan (Corp Gov)</li> <li>• Consult ET on audit programme subjects and timings before Audit Committee signs it off (Corp Gov)</li> <li>• Do a presentation on the main findings of audits to bring them to life and agree actions (Corp Gov to arrange)</li> <li>• Transfer recommended actions to the business plan or personal objectives for follow-up (ET)</li> <li>• Publish audit timetable and summary of key outcomes on ICON (Corp Gov)</li> </ul>

<b>Component</b>	<b>Business plan</b>
<b>Standard characteristics</b>	<ul style="list-style-type: none"> <li>• One year</li> <li>• Supports Corporate Plan</li> <li>• SMART objectives showing business improvements rather than business as usual and impacts / dependencies</li> <li>• Often reflects organisational structure</li> </ul>
<b>Owner</b>	Sue Fox supported by Corporate Governance
<b>Desired improvements</b>	<ul style="list-style-type: none"> <li>• SMART objectives (internal audit recommendation 2009/10 05)</li> <li>• Clarify when we need business as usual information and when we need to show business improvements</li> <li>• Plan together to identify impacts and dependencies</li> <li>• Do the budget at the same time</li> <li>• Consult with staff and unions</li> <li>• Meet deadlines for planning and reporting</li> </ul>
<b>Actions</b>	<ul style="list-style-type: none"> <li>• Structure it by directorate to show ownership and</li> </ul>

	<p>accountability; a high-level ICO business plan for the main business objectives and matching sub-plans for directorates/teams; two sections – business as usual (for anticipated volumes and service standards) and business improvements (for the new projects or improvement programmes aimed at reaching improved business as usual volumes) (Corporate Governance)</p> <ul style="list-style-type: none"> <li>• Write SMART objectives (ET members)</li> <li>• Respect deadlines (ET members)</li> <li>• Discuss impact and dependencies at ET (Corp gov)</li> <li>• Explicitly consult staff and unions (Corp gov)</li> <li>• Budget at the same time, involving Andy Cryer in the process (Corp gov/ET members) – see Budget section</li> </ul>
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<b>Component</b>	<b>Budget</b>
<b>Standard characteristics</b>	<ul style="list-style-type: none"> <li>• Currently one year (plus longer-term forecasts)</li> <li>• Supports business plan</li> <li>• Takes account of impact / dependencies</li> </ul>
<b>Owner</b>	Christopher Graham supported by Andy Cryer
<b>Desired improvements</b>	<ul style="list-style-type: none"> <li>• Write the budget and business plan at the same time</li> <li>• Clarify who is responsible for which budget areas</li> <li>• Scenario plan to cope with less (or more) income</li> <li>• Report on value for money to stakeholders</li> <li>• Encourage efficiency savings</li> </ul>
<b>Actions</b>	<ul style="list-style-type: none"> <li>• Do budget alongside business plan and involve Finance (ET)</li> <li>• Do budgets to show what we'd do with the same money and plus or minus 20% (ET with finance)</li> <li>• Record efficiency savings in the budget narrative and reward the directorates who generate the savings (C Graham/finance)</li> <li>• Report on value for money to stakeholders by demonstrating the benefit to society and reporting on efficiency savings (internal audit recommendation 2009/10 07) (Finance)</li> </ul>

<b>Component</b>	<b>Personal objectives and PDRs</b>
<b>Standard characteristics</b>	<ul style="list-style-type: none"> <li>• One year</li> <li>• Supports business plan</li> <li>• SMART objectives</li> <li>• Takes account of impact / dependencies</li> <li>• Training needs identified</li> </ul>
<b>Owner</b>	Vicky Best supported by Fran Adamson
<b>Desired improvements</b>	<ul style="list-style-type: none"> <li>• SMART objectives</li> <li>• Hit deadlines</li> <li>• Make clear links between objectives and corporate or business plans</li> <li>• Further embed values</li> </ul>
<b>Actions</b>	<ul style="list-style-type: none"> <li>• Check objectives written by their direct reports, and reject any non-SMART ones and those that don't contribute to the corporate plan (ET)</li> <li>• Respect deadlines (ET)</li> </ul>

<b>Component</b>	<b>Reviews and reporting</b>
<b>Standard characteristics</b>	<ul style="list-style-type: none"> <li>• Clear reporting against the plan (whether Corporate, Business or budget)</li> </ul>



	<ul style="list-style-type: none"> <li>Usually quarterly and annual</li> </ul>
<b>Owner</b>	Sue Fox supported by Corporate Governance
<b>Desired improvements</b>	<ul style="list-style-type: none"> <li>Stick to deadlines</li> <li>Report in terms of outcomes for society</li> <li>Align the Annual Report and Corporate Plan</li> </ul>
<b>Actions</b>	<ul style="list-style-type: none"> <li>Write the Corporate Plan with the Annual Report in mind (Christopher Graham)</li> <li>Commission the right market research and management information to measure success (ET members)</li> <li>Do agreed actions and stick to agreed deadlines (ET members)</li> </ul>

<b>Component</b>	<b>Balanced Scorecard</b>
<b>Standard characteristics</b>	<ul style="list-style-type: none"> <li>Top-down, aligned with organisational strategy, covers the whole organisation and measures performance. A succinct way of reporting performance year on year.</li> <li>Helps organisations get all aspects of the business right.</li> <li>Tracks trends</li> <li>Usual areas are Customers, Business Process and Motivation/learning, but can be tailored to suit different organisations.</li> </ul>
<b>Owner</b>	Sue Fox supported by Corporate Governance
<b>Desired improvements</b>	<ul style="list-style-type: none"> <li>Develop a range of key performance indicators for MB to show overarching objectives are being met (Internal audit 2007/08 02/04)</li> <li>Create a balanced scorecard (Internal audit 2009/10 06)</li> </ul>
<b>Actions</b>	<ul style="list-style-type: none"> <li>Develop a new balanced scorecard after the business and corporate planning process has been agreed and amended – involve MB, ET and staff - (Corp gov)</li> <li>Consult unions and staff (Corp gov)</li> <li>Brief staff and bring it to life (Corp gov)</li> </ul>

## 5 Next steps

Corporate Governance to:

- Draw up and implement a project plan with priorities, timescales and actions to carry out the agreed recommendations
- Revise ICO policies and processes to reflect new approaches
- Draw up a workplan for ET showing the timetable for each component of the planning process through the year, with milestones, key meeting dates, deadlines for papers and reports etc.
- Grant Thornton to support the above with “future tense” auditing to check it will be fit for purpose.
- Review this process annually.