

Meeting	Executive Team	Date	15/09/2014
Agenda item	4	Time	10 Minutes
Proactive publication	No	Internal publication	Yes
Title	Registration Service - Fee Tier Assessment		
Presenter	Simon Entwisle		
ICO Plan aim	3. Customers receive a proportionate, fair and efficient response to their information rights concerns		
Information rights strategy aim	10. The public confident in information rights law as necessary, serving the public interest, effective in practice and properly enforced.		
Issue	To satisfy a Grant Thornton recommendation ET are asked to consider the following proposal for an audit of registration fees.		
Decision	Approve the proposal or make alternative recommendations		
Financial impact			
Risks			

Registration Service - Fee Tier Assessment

Revising our internal assurance processes

August 2014

Decision required by ET?

To satisfy a Grant Thornton recommendation ET are asked to consider the following proposal and either approve it or make alternative recommendations.

Background

When data controllers register they self assess to determine the fee they are required to pay. It is very important for us to make sure that data controllers pay the correct fee. Based on past experience, we are satisfied our guidance on this aspect of registration is well understood and that very few data controllers get it wrong. Nevertheless, we need to have solid processes in place to check that this continues to be the case, particularly following the major changes made to the service in the past 12 months.

As part of the National Audit Office (NAO) year end audit, checks are made to confirm that our approach is resulting in data controllers paying the correct fee. We traditionally support this process by doing our own spot checks throughout the year.

Following the changes made to our Registration service, and in particular the introduction of increased self service opportunities for customers, it is no longer true to say that all new registrations are checked by ICO staff before fees are processed.

For those customers who register by phone we have the opportunity to discuss the fee tier before the fee is processed. However, for those customers registering online we are relying more heavily than in the past on the self assessment features built into our new online service to make sure data controllers are paying the correct fee..

In recognition of this change to the service Grant Thornton recommended we consult with the NAO to agree a suitably robust means of checking that data controllers, and particularly those registering online, are paying the correct fee.

Advice from the NAO was received in early August.

What is being proposed?

The NAO have confirmed that as part of their year end audit they randomly sampled approximately 40 registrations. They were satisfied that the registration self assessment process was resulting in data controllers registering at the correct fee tier. This was reflected in their report.

Replicating the NAO's sample is therefore understood to be sufficient to provide the necessary internal assurance.

Because they used a complex formula to identify the sample the NAO have recommended that we use a larger sample to take account of the margin for error caused by using less sophisticated sampling techniques.

We are therefore proposing to sample 60 registrations per year at a rate of 15 per quarter. This is 50% more than the NAO sampled.

Because of the increased risk of data controllers registering online paying the wrong fee 2/3 of the sample will be of online registrations.

This exercise will therefore involve extracting a total of 15 newly registered data controllers at random each quarter and determining if they paid the correct fee. If necessary we will contact the data controller to confirm this.

The results will be recorded and if discrepancies are identified processes will be reviewed proportionately.

We will also retain the results of our sampling exercise to help support the NAO's work at the end of the financial year.

Paul Arnold
Head of Customer Contact and Business Development
18.8.2014