

Meeting: Senior Leadership Team **Date:** 10 July 2017

Agenda Item: 5 **Time:** 10 minutes

Proactive Publication: Yes **Internal Publication:** Yes

Communications options:
key messages / SLT extra / Blog / external communications

Presenter: Paul Arnold

Topic: ICO secondment programme

Issue: A proposal for a proactive and continuous programme of inbound secondments to the ICO to supplement our established workforce.

Background:

Secondments can be beneficial to the ICO. Sending our staff out on secondment can be a way of both the individual and our organisation developing new skills and benefiting from outside experience and expertise. Similarly, inviting organisations to second staff to work at the ICO has the potential to:

- Supplement our workforce at a time when increasing our capacity and capability is a priority.
- Help us maintain our relevance by inviting our stakeholders to second staff to us for a period of time, providing us with greater insight into the work of those we regulate or work alongside.
- Improve information rights compliance as those seconded to us return to their regular employers with increased insight into the work of the regulator and the standards expected.

So far secondments have been occasional things which see us taking advantage of opportunities as they arise. This proposal suggests that we express an external and continuous interest in seconding people to work for us and develop a programme to ensure we maximise the benefit of any such arrangements.

Discussion:

One of the key issues to consider is that of potential conflicts of interest. Clearly having a secondee from a given sector working in an area which directly regulates that sector could be problematic. However, given the breadth of our work and the size of the organisation it ought to be possible to maintain the necessary segregation of duties needed for the programme to succeed.

We would need to ensure that any secondment was sufficient in length to be of clear benefit to us. Whilst the duration of any given secondment may vary, based on the individual circumstances, we would expect them to be of a minimum of three months in cases where the secondee could be immediately productive, but more likely to be of at least 12 months in length where any significant training would be required.

In terms of cost, we should ensure that the organisations seconding people to us derive a clear benefit from doing so. If we are offering a genuine insight into the work of the regulator then these secondment opportunities should be attractive to a great many stakeholders. Whilst we can typically expect to make a contribution to the salary of a secondee we would not expect this to exceed the cost of the equivalent ICO member of staff for the same period unless in exceptional circumstances. In some cases we may be able to secure secondments at minimal cost to us. The cost of secondments would be covered by the salaries budget with this spend governed in the same way as all other recruitment activities.

We must also recognise that in some cases there may be an expectation of a reciprocal arrangement, with us seconding someone to work with another organisation. We should of course review any such proposals on a case by case basis. However, it is important for the SLT to provide a steer as to our appetite to see staff seconded away from the ICO at any given time. This will require us to look at the medium and long term benefits as a means of offsetting the obvious short term cost of relinquishing our staff to work elsewhere for a given period.

It is also important that we recognise the sensitivity amongst our established workforce to our use of secondments. Secondments can create the impression that we lack confidence in the capability of our own workforce to 'step up' to fulfil the roles being offered on secondment. Whilst we should be sensitive to this, there is a place for secondments in addition to promotion or temporary promotion opportunities. Given the rate at which we are currently expanding there is no need for any secondment offered externally to be at the expense of an internal promotion opportunity. We should however commit to only agree to secondments where they enable the ICO to access otherwise unavailable insight or capability, or where they help us to develop our own capability more rapidly or easily.

Given our ever developing international remit and workload we should also consider the potential benefit of international secondments, offering the opportunity for colleagues from other Supervisory Authorities to be seconded to work at the ICO. This will require us to consider applying to become a sponsoring department for the purposes of visa applications, but this feels appropriate given our international aspirations.

Each department head would be responsible for identifying opportunities within their department for secondments to add value, but they would be expected to do this in line with the appetite for secondments as indicated by the SLT.

The OD Department would develop a standard secondment policy and agreement to streamline the advertising and support of secondments and to ensure transparency across the programme.

We should also consider hosting a dedicated page on the website to promote and explain the programme. The NCSC have the following web page (see annex or link to <https://www.ncsc.gov.uk/information/industry-100>).

Something similar may therefore be suitable for us.

Options and recommendations:

We of course have the option not to pursue secondments as an element of our recruitment strategy.

However, we recommend that we do establish a programme. It is widely accepted at the ICO that the expertise of our staff is in high demand by organisations seeking to prepare for and comply with GDPR. This same demand would, we believe, mean that organisations would be keen to second staff to the ICO as a way of deriving insight and expertise from the regulator.

We also know that our guidance is widely used by our fellow Supervisory Authorities around the world. It therefore seems likely that being able to second staff to us to assist with the development of that guidance would be a very attractive proposition for those in a position to do so, with the added bonus of perhaps assisting with our aim of increasing our influence on the worldwide stage.

It is also recommended that we prioritise secondments which directly support our strategic goal to be a tech-savvy regulator. Schemes like that available from the NCSC present a clear opportunity for us to bring in additional short term cyber expertise and experience whilst also investing

in the medium and long term development of some of our own staff in this area.

Next steps:

Views of all department heads were recently sought via the DCEO Steering Group with overwhelming support confirmed. If agreed we would need to prioritise the work involved as part of our wider OD programme of projects, but with the support and active participation of departments across the organisation there is no reason why this programme, at least in a pilot form, could not be up and running relatively quickly.

Consultees:

Simon Entwisle, Steve Wood, James Dipple-Johnstone, DCEO Steering Group.

Join the Industry 100

One of the key objectives of the National Cyber Security Centre (NCSC) is to reduce risks to the UK by working with public and private sector organisations to improve their cyber security. As part of Industry 100, we are inviting organisations of all sizes to work with us by embedding staff into the NCSC so we can achieve a greater understanding of the cyber security environment using wide and diverse thinking.

By working together in a number of roles throughout the organisation, we want to develop a clear understanding of the cyber threat to the UK and share information that can have an impact across the community. That means analysts, network defenders, academics and engagement partners working side by side, on the issues that matter. Whether that's writing guidance for dealing with ransomware attacks, or improving the way that company boards look at investment in cyber security - by working together, we are bringing industry and government expertise together in a way that helps us all learn lessons, identify systematic vulnerabilities and reduce the future impact of cyber attacks.

How it works

Teams from across the NCSC will post advertisements here (online) when we identify roles where we want to bring in industry expertise and ensure we're collaborating on important matters so we can improve our products and services. Whether you're a small or medium-sized enterprise or a multinational operating in the UK, we are seeking the very best from a wide variety of skills and sectors.

As an organisation, you can apply to embed a person(s) as an integree and we will assess the suitability of the person on a case by case basis with a formal interview, and sometimes with additional testing. The requirement of the terms will vary across teams and all entrants are subject to a screening process and contract between the NCSC and embedding organisation.

More posts are coming soon so watch this space!

Note: This scheme is for organisations to apply and embed personnel. We will not accept applications for full time employment with the NCSC. Employment opportunities with the NCSC can be found on the Civil Service Jobs website. While we will endeavour to reply to each enquiry, we cannot guarantee this.

Contact and applications

All applications should be submitted within the conditions of the individual advert. Applications and general enquiries can be submitted to integrees@ncsc.gov.uk.

You can access adverts from the '**downloads**' tab.

Please be aware that while the NCSC will respond to each application, this may take up 30 days.

