

Executive Team (ET) minutes

25 November 2024

Details of attendees are provided at the end of the minutes.

1. Introductions and apologies

- 1.1. ET welcomed Tim Capel to the meeting in his new role as Interim General Counsel. Apologies were received from Louise Locke.

2. Declarations of interests

- 2.1. No declarations of interests were made. Interests noted from all on conflicts of interest policy.

3. Matters arising from the previous meeting

Minutes

- 3.1. The minutes of the previous meeting had been approved as a correct record.

Actions

- 3.2. ET noted the actions from previous meetings.

3.3. Conflicts of interest policy update

- 3.4. Louise Byers presented ET with an overview of the updates to the Conflicts of Interest policy, prior to its approval at management board in February. Louise explained that the drivers for updating the policy now are a recent internal audit on conflicts of interest and to prepare for governance transition and the appointment of non executive directors to the new ICOM board.
- 3.5. ET were keen to ensure that the policy is both fit for purpose now and is future proof to support the transition to the new government arrangements. ET discussed the definitions of the categories of organisations and the types of conflict and action that would be taken, agreeing that the policy should be updated to reflect a broader spectrum of factors to account for varying levels of conflict. ET also agreed to include a matrix to help assess types of conflict and corresponding appropriate action using an impact vs involvement approach. ET also discussed the interactions between the Conflicts of Interest policy and the ICO Staff Code of Conduct.

- 3.6. ET agreed to review the changes to the policy before presenting to Management Board in February.

ACTION: Louise Byers to update the draft conflicts of interest policy following the discussion and revert back for further discussion with ET. Due date: 16/12/24

4. [Update on ongoing and upcoming litigation](#)

- 4.1. Director of Litigation, Rebekah Black and Director of Freedom of Information (FOI) Appeals and Prosecutions, Carolyn Hubble presented a legally privileged report updating ET on current and upcoming key litigation.

5. [Update on the work of Regulatory Group](#)

- 5.1. Emily Keaney presented a report setting out the recent work of the Regulatory group. Emily highlighted the horizon scanning paper which was discussed with the Senior Leaders Forum and has also been presented to the Regulatory Committee with additions on the online tracking and international horizons. The Strategic Planning directorate is working on feeding this paper into the business planning work. ET discussed how the report will impact the causes for the next financial year and it was confirmed that that this will be discussed at an ET level meeting on 2 December to agree the business and financial planning approach for the next year.
- 5.2. Emily also noted that the group took part in a risk workshop which has started to identify the specific regulatory risks that Regulatory Group will own. Further work is to be done in this space and an additional discussion has been tabled to complete it.
- 5.3. The Regulatory Group work programme includes its first formal tier one decision from children's privacy at the next meeting. Emily confirmed that the group will be looking at prioritisation, intended approach and potential trade offs to ensure successful delivery of agreed outcomes.

6. [Update on the work of Delivery Group](#)

- 6.1. Jen Green presented a report setting out the recent work of the Delivery group. Jen highlighted that the focus of the group's discussions has been on budget and related spending plans.
- 6.2. Jen also confirmed that prior to the ET finance and business planning discussion on 2 December, a pack of preparation information will be circulated to ET. This will support the planning

for next year, including an assessment of priorities, and of investment in resources, products, and services. The information within the pack and subsequent decisions following the planning session will enable ET to work with directorates through their business planning process.

ACTION: Jen Green to circulate the pack of papers to support the ET business and planning session on 2 December 2024. Due date: 27/11/24

7. [Update on the accommodation strategy – process and timeline](#)

- 7.1. Jen Green gave a verbal update on the process and timeline for the accommodation and estates strategy. This is due to go to management board for a decision in March. The process will include full market research and financial analysis by the end of January, staff engagement on decision making processes, ET decision in February and final approval by Management Board in March 2025 prior to Cabinet Office approval in line with the Government Estate Strategy.
- 7.2. Jen highlighted some critical success factors for the accommodation strategy, including;
 - increased diversity,
 - retaining current skills,
 - the ability to obtain the right skills in the future, and
 - accessibility to London and other hubs.
- 7.3. Economic Analysis has provided a review of geo spatial data to support the decision making. This includes locations, commute costs, diversity, occupancy rates and other related data. Whilst the data will provide a useful base, the final decision will take a common sense and reputation approach to ensure final success criteria.
- 7.4. ET recognised the high levels of colleague interest in the accommodation strategy and emphasised that a decision has not yet been taken on the location of the head office. ET supported the approach to involve colleagues in the decision-making process as much as possible within the constraints of commercial sensitivities and timing.

8. [Any other business](#)

ET all staff briefing

- 8.1. Jen Green raised the issue of the content and format for the upcoming all staff briefing scheduled for 18 December; noting a need for a cadence and planning cycle for the future quarterly meetings. ET agreed that the December briefing should be viewed as a continuation of an annual cycle, alternating between Q&A sessions and more targeted briefing sessions and update opportunities.
- 8.2. ET agreed that the format for the December session would be a virtual Q&A with John and Paul, hosted by Jen. It was acknowledged that the questions are likely to be broad, with an interest in the people survey actions.

Guidance governance process

- 8.3. Emily Keaney asked ET colleagues to ensure that relevant teams are engaged with the guidance governance process to make sure that interdependencies with Data Use and Access bill are accounted for.

Data Lives Year 2 Report

- 8.4. Emily Keaney noted the excellent and insightful Data Lives Year 2 report, and encouraged ET colleagues to read and share it with their teams.
- 8.5. ET endorsed the report and discussed the valuable continuation of insights into topics such as online tracking comprehension.

9. [Key messages to staff](#)

- 9.1. ET agreed the key messages to staff.

[Attendance](#)

Members

Angela Balakrishnan	Executive Director, Strategic Communications and Public Affairs
Emily Keaney	Deputy Commissioner (Regulatory Policy)
Jen Green	Executive Director, Strategy and Resources
John Edwards	Information Commissioner
Paul Arnold MBE (Chair)	Deputy CEO and Chief Operating Officer
Rob Holtom	Executive Director, Digital, Data, Technology (DDaT), Transformation and Delivery
Stephen Almond	Executive Director, Regulatory Risk
Stephen Bonner	Deputy Commissioner (Regulatory Supervision)
Tim Capel	Interim General Counsel

Attendees (attending via Teams)

Carolyn Hubble	Director Legal Services (for item 5)
Catherine Heverin	Private Secretary to Louise Locke
David Squires	Private Secretary to Stephen Almond
Farhana Ahmed	Private Secretary to Rob Holtom
Fiona Simkiss	Private Secretary to Jen Green
Izy Jude	Private Secretary to Stephen Bonner
Louise Byers	Director of Risk and Governance (for item 4)
Mariam Boakye-Dankwa	Head of the Commissioner's Private Office
Rebecca Bradbury	Private Secretary to Paul Arnold
Rebekah Black	Director Legal Services (for item 5)
Willow Warder	Private Secretary to Emily Keaney
Tom Parkman	Private Secretary to Claudia Berg and Tim Capel

Secretariat

Laura Tomkinson	Group Manager Corporate Governance
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