

Management Board – for assurance

Meeting agenda title: Management Board effectiveness review – update

Meeting date: 29 September 2025

Time required: 10 minutes

Presenter: Louise Byers

Approved by: Jen Green

1. Objective and recommendation

- 1.1. This report gives the Board assurance on the progress made with the actions identified from the Management Board effectiveness review.

2. History and dependencies

- 2.1. In January 2025, Management Board undertook a 'light touch' effectiveness review. The outcomes of this were reported to the Board's February 2025 meeting, and the Board agreed **six** actions to continue to enhance the Board's effectiveness.

3. Matters to consider to achieve objective

- 3.1. **Action 1:** Away day for the Management Board to be scheduled to focus on strategic direction and in particular, regulatory strategic direction.

Update: In progress: Building on the strategy day held in 2024, and the Board's continued engagement through scheduled meetings, a paper will be brought to the Management Board in November 2025 which will enable the Board to further contribute to the development of the organisation's next strategy. This will include the organisation's vision, mission, strategic choices and regulatory strategic direction.

Action 2: As part of an away day, discussions could cover the current and future Board's role, the ICO's context, members' expertise and consideration could be given whether to invite independent challenge from a critical friend.

Update: In progress: Further building on the Board strategy day held in July 2024, and subsequent sessions held with other Chairs

to provide challenge and insight, the final Board effectiveness questionnaire, scheduled for late 2025, is expected to provide a valuable opportunity for continued input from Non-Executive Directors into the future role, expertise, and contribution of the Board.

Action 3: Organisational development to work with Non-Executive Directors and the Senior Independent Director to share development opportunities.

Update: In progress: Our Organisational Development Team are working on preparing a tailored development plan for the newly appointed Non-Executive Directors, to support their induction and ongoing effectiveness in the role and will liaise with Non-Executive Directors as appropriate to develop this content.

- 3.2. **Action 4:** Ensure that the forward work programme incorporates items to enhance the Board’s engagement on culture discussions

Update: In progress: Culture has been a key focus of People Committee discussions in 2025, particularly the employee experience programme delivery and EDI objectives for 2026, with updates routinely provided to the Board. Further work on EDI strategy accessibility reporting and the people aspects of the employee experience and high performance strategy are scheduled to be considered at future meetings.

- 3.3. **Action 5:** Consideration of the Management Board’s suggestions around monitoring performance on strategic goals will continue to be part of the ongoing improvement work on performance measures.

Update: In progress. The majority of this recommendation will be addressed through the new Q1 performance scorecard, which will be presented at the September Board meeting. The scorecard has been developed with consideration of the Board’s previous feedback. Future reports should continue to demonstrate progress against this recommendation.

- 3.4. **Action 6:** The governance transition programme sponsor to ensure the Non-Executive Directors are kept up to date on governance transition progress and gather their input.

Update: Completed: In February 2025, the Board received a presentation on governance transition as part of its informal session. In June 2025, a number of Non-Executive Directors

engaged with the Executive and Senior Leadership teams at their development day to share their experiences and contribute to preparations for the upcoming transition.

Future Board effectiveness reviews

- 3.5. The Board has previously agreed to conduct annual effectiveness reviews.
- 3.6. In light of the transition to the new statutory board in Spring 2026, it is proposed that the 2025/26 annual review questionnaire be commissioned in December 2025. This timing will allow for a final assessment of the outgoing Board's effectiveness, provide a baseline for the new statutory Board's development and capture lessons learned. A similar approach is being adopted for the Board's Committees as well.
- 3.7. To support this, the Corporate Governance Team will review and update the questionnaire to reflect any relevant changes. Board members are invited to share any suggestions or areas of focus they would like to see included in this year's review.

4. Areas for challenge

- 4.1. The report is for assurance purposes but are there any areas where the Board would expect further action beyond that which has already been taken or planned?

5. Communications considerations

- 5.1. There are no communications requirements for this report.

6. Next steps

- 6.1. The next steps for this work are:
 - Commission and deliver the 2025/26 annual effectiveness review questionnaire in December 2025. This will provide a final assessment of the outgoing Board's effectiveness, establish a baseline for the development of the new statutory Board, and capture lessons learned.
 - Report the outcomes and any resulting actions to the Board at its February 2026 meeting. Dedicated time will be scheduled within that session to allow for discussion and reflection on the findings. The report will also to be shared with the incoming Board for information and continuity.

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Publication decision: This report can be published internally and externally without redaction.