



**INFORMATION COMMISSIONER'S OFFICE  
STAKEHOLDER PERCEPTIONS STUDY**

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Commissioned by COI on behalf of the Information Commissioner's Office

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# 1 Research Context, Approach and Sample Profile

## a) Research Context

The Information Commissioner's Office (ICO) regularly conducts research among a number of audiences with which it has dealings. These studies cover the organisations and individuals (members of the public) that use its services, as well as staff. While a significant volume of research has been conducted over the last few years, a gap in understanding was identified, that gap being the perceptions of the key stakeholders with whom the ICO works closely with.

Following on from an exercise conducted by COI Strategic Consultancy that mapped the ICO's stakeholders and informed its stakeholder engagement strategy, the ICO was looking to explore and understand its standing and reputation among key stakeholders by tracking what were identified as the key drivers of reputation in the strategy. These drivers are outlined below:

- ▶▶ Performance levels
  - Good quality, consistent, timely, evidence-based casework
- ▶▶ Advice, Guidance and Information
  - Clear, authoritative and user-friendly
- ▶▶ Knowledge
  - ICO's understanding/interpretation of the Acts and their stakeholders' processes
- ▶▶ Accountability
  - Including greater transparency
- ▶▶ Policy Engagement
  - To ensure DP/FOI issues are considered at an early stage
- ▶▶ Relationships
  - Building, developing, maintaining links with key stakeholders
- ▶▶ Serving the Consumer
  - Educating and informing the public
- ▶▶ Propriety and Proportionality
  - Sensitivity to concerns, pragmatism etc
- ▶▶ Enforcement

- To ensure compliance and raise public consciousness

In total some 50 external stakeholders were identified, these being drawn mainly from the public sector, but also including private sector organisations and informed commentators. These organisations are a specific group of stakeholders which the ICO works closely with. All 50 were approached with a view to participating in the research.

## b) Research Approach and Sample Profile

Given the limited size of the universe a semi-structured interview approach was chosen. Interviews involved respondents answering a combination of pre-coded performance scale questions (quantitative) and open ended verbatim questions (qualitative) where they were asked to provide the detail on why particular ratings were given. Given their importance to the ICO, respondents were also given the opportunity to feed back or comment on any issues that were pertinent to them.

The combination of quantitative and qualitative data is particularly powerful as it provides a complete picture of performance, indicating not just 'how' the ICO is seen, but also 'why'.

A series of 37 semi structured interviews was completed between 3<sup>rd</sup> and 28<sup>th</sup> March 2008. Interviews took an average of 25 minutes to complete and breakdown of the sample was as follows:

- ▶▶ 19 with Freedom of Information (FOI) stakeholders; and
- ▶▶ 18 with Data Protection (DP) stakeholders.

Whilst the sample size could be considered to be low in strict quantitative terms, the data is robust as it covers around three-quarters of the universe (c. 50 contacts).

As indicated earlier, the sample was focussed on the public sector with 68% or 25 of the 37 respondents from this group. The remainder comprised informed commentators (19% or 7 respondents), followed by academics (8% or 3 respondents) and commercial organisations (5% or 2 respondents).

## 2 Key Findings

Overall we believe that this project highlights many positive aspects of the ICO and the results are encouraging. There are, however, some areas which would benefit from improvement, particularly focussing on the FOI stakeholders.

Clearly one of the greatest issues to emerge from this research, and illustrated consistently in the charts is the difference in attitude between the FOI and the DP stakeholders. Although the DP stakeholders were less likely to feel that they are engaged on policy development and that the ICO is accountable, on all other aspects they were more positive towards the ICO than the FOI stakeholders suggesting that the challenge is to maintain the strong performance for the DP stakeholders whilst improving performance for the FOI stakeholders.

The two key drivers of overall performance ratings were 'professionalism' and 'the quality of advice and information' and whilst the ICO scored well on professionalism, there appears to be opportunity for improvement in perception of quality (and consistency) of advice and information given - particularly to the FOI stakeholders. We would also note that the issues of timeliness and consistency of advice are areas where improvements could be targeted, particularly for the FOI stakeholders as the scores here are well below the average.

Starting from a reasonably positive base, there still appears to be room for improvement regarding the overall relationship between ICO and stakeholders especially focussing on the methods of communication and information sharing. For example, we suggest that the ICO looks to meet the request for more ongoing informal contact as this would appear likely to improve the overall relationship with and perception of the ICO. In particular there is a request to involve stakeholders early in any process or consultation that is ultimately going to affect them.

The FOI stakeholders were also less likely to feel that their relationship with the ICO had improved in the last year, or that it compared favourably with other organisations, so again, this sub group would be the primary target for a relationship building initiative.

Other areas where the ICO's performance could improve for stakeholders include a greater understanding of their organisations and internal issues, and as a result, respecting stakeholders' timescales and managing expectations in terms of time/information delivery.

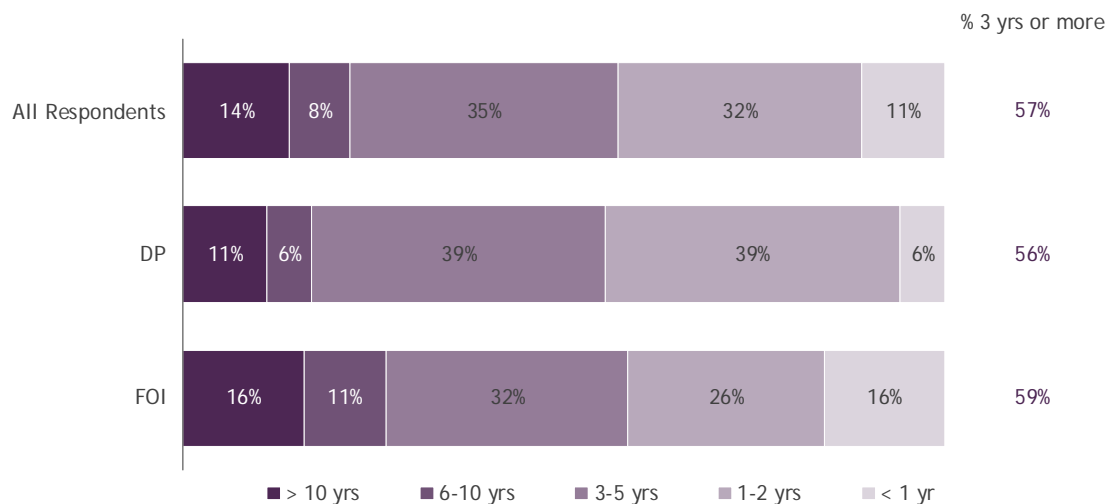
Other useful tools to develop to enhance perception of the ICO and the working relationship overall would be improved enforcement and raising the profile of the e-newsletter, and increasing regional contact and content.

### 3 Contact with ICO

#### a) Length of Relationship with the ICO

Respondents were asked when they had first started to have contact with the ICO and the chart below highlights the spread of length of relationship across the sample.

Looking at the total sample, over half (57%) had been involved with the ICO for 3 years or more, with 14% being involved for over ten years. At the other end of the scale, 11% of the total sample had been involved with the ICO for less than a year.



Q1d. When did you personally first start having contact with the Information Commissioner's Office? *\*Where figures do not add up exactly, this is due to rounding*  
 Base: Total (n=37), DP (n=18), FOI (n=19)

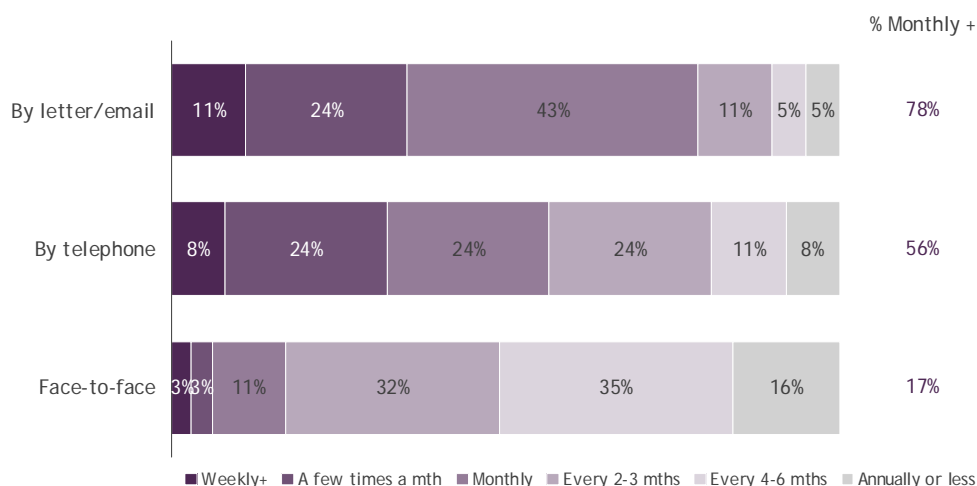
#### b) Frequency of Contact with the ICO

The sample was asked a series of questions relating to their frequency and method of contact with the ICO.

The most frequent contact with the ICO was by letter/email with 78% of the total sample in contact with the ICO in this way at least once a month, and hence illustrating that this is a key channel of communication.

Contact by phone was also relatively frequent with 56% of the sample in contact by phone at least once a month.

In comparison, only 17% were in face to face contact at least one a month. Two thirds of the sample (67%) was in face to face contact between every 2 to 6 months.



Q3a. On average, how frequently do you have written contact, via letter or email, with the ICO? Q3b. On average, how frequently do you have telephone contact? Q3c. How frequently do you have face-to-face contact?  
 \*Where figures do not add up exactly, this is due to rounding  
 Base: Total (n=37), DP (n=18), FOI (n=19)

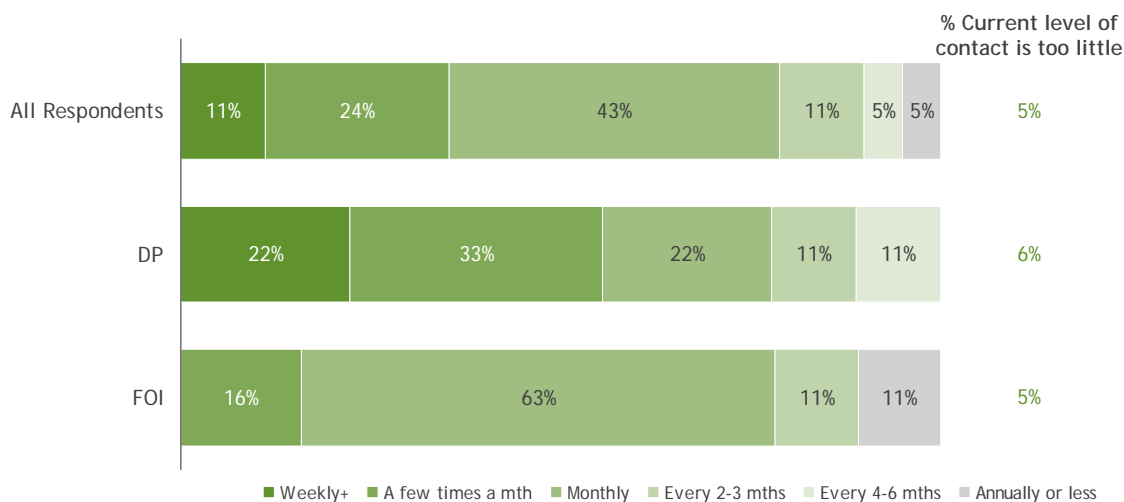
When asked to suggest improvements to the current processes, there was some call for more regular face to face meetings, and for more informal discussion (either telephone or face to face) preceding decisions for greater input, clarity and perhaps a feeling of ownership.

Other contact issues concerned the Wilmslow location, as this can inhibit the ease of holding impromptu meetings and of sending documents between offices. However, with a high proportion of stakeholders being based in London (around two-thirds), this is unlikely to change.

Looking in more detail at the sub groups of DP and FOI, and the communication channels, respondents were also asked to rate their satisfaction with the rate of that contact.

Focussing first on contact by letter and email, DP stakeholders were having significantly more regular written contact (22% 'weekly', 33% 'a few times a month'). In comparison, no FOI stakeholders were having weekly contact by this method and only 16% claimed written contact of 'a few times a month'. Nearly two thirds of these stakeholders (63%) were in contact 'monthly'.

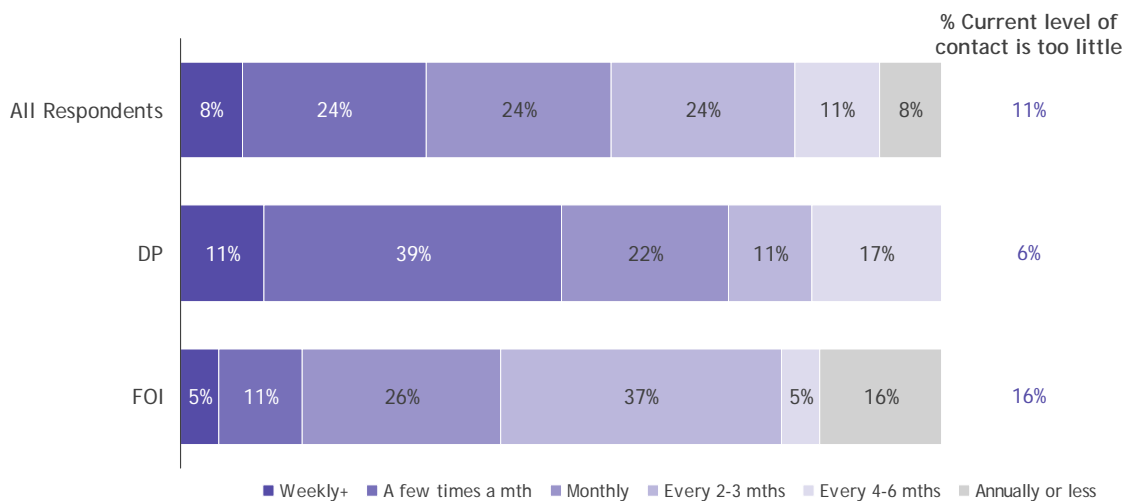
Encouragingly, across both groups, the level of contact was broadly acceptable with only 6% of DP, and 5% of FOI stakeholders, feeling that the 'current level of contact is too little'.



Q3a. On average, how frequently do you have written contact, via letter or email, with the ICO? Q3d. Using a scale of too much, about right or too little, how would you rate the level of contact you have with the ICO via each of the following channels....  
 \*Where figures do not add up exactly, this is due to rounding  
 Base: Total (n=37), DP (n=18), FOI (n=19)

Moving on to contact with ICO by telephone, DP stakeholders were again having much more frequent telephone contact in comparison with FOI stakeholders (DP 'weekly' 11%, 'few times a month' 39% - total 50%; FOI 'weekly' 5%, 'few times a month' 11% - total 16%).

And, pointing to some low level of dissatisfaction amongst the FOI stakeholders, 16% felt that their current level of contact was too little suggesting that this may need to be addressed if satisfaction with the level of telephone contact amongst this group is to be raised.



Q3b. On average, how frequently do you have telephone contact? Q3d. Using a scale of too much, about right or too little, how would you rate the level of contact you have with the ICO via each of the following channels....  
 \*Where figures do not add up exactly, this is due to rounding  
 Base: Total (n=37), DP (n=18), FOI (n=19)

Specific comments made in relation to phone contact included:

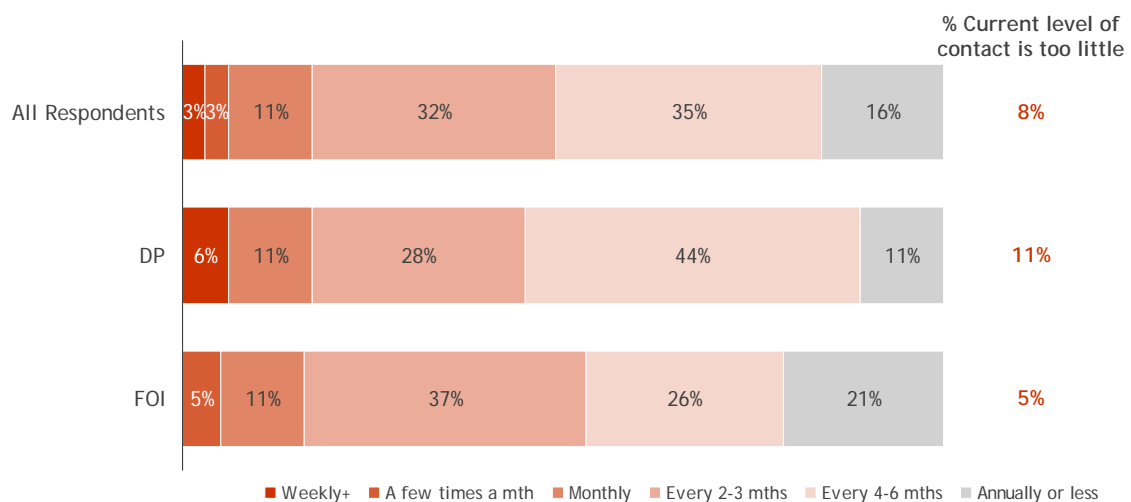
*“It is always helpful if they pick up the phone and let us know what is going on rather than sending us a shirty letter”* FOI

*“(there is) a central phone number and not the individual number which would be better to have”* (FOI)

*“There are occasions when more exchanges preceding decisions and guidance would be helpful.”* (FOI)

Focussing on face to face contact, there was a more consistent picture across the two groups with less than a fifth of the DP stakeholders (17%) and FOI stakeholders (16%) having face to face contact at least monthly.

11% of DP stakeholders claimed that the current level of contact was too little (5% FOI) suggesting that this is an area that could be improved upon for a minority.



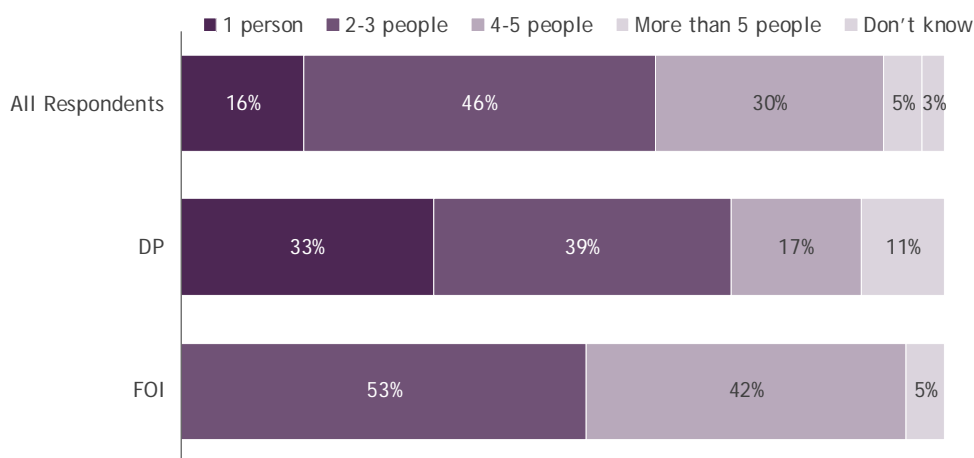
Q3c. How frequently do you have face-to-face contact? Q3d. Using a scale of too much, about right or too little, how would you rate the level of contact you have with the ICO via each of the following channels....  
\*Where figures do not add up exactly, this is due to rounding  
 Base: Total (n=37), DP (n=18), FOI (n=19)

### c) Number of Contacts within the ICO

Respondents were asked *“and in general, does your contact with the ICO involve having contact with 1 person, 2 - 3, 4 - 5 or more than 5 people?”*

A clear picture emerged here with one third (33%) of the DP stakeholder group typically dealing with one person, and just over one third (39%) with 2 - 3 people. In contrast, just

over half (53%) of the FOI stakeholder group were dealing with 2 - 3 people, and 42% with 4 - 5 people.



Q4a. And in general, does your contact with the ICO involve having contact with...?

\*Where figures do not add up exactly, this is due to rounding  
Base: Total (n=37), DP (n=18), FOI (n=19)

There were some indications from respondents of situations where multiple points of contact within ICO had caused problems:

- ▶▶ different advice received from different sources; and
- ▶▶ cases where details appear not to have been passed on in conversations internally.

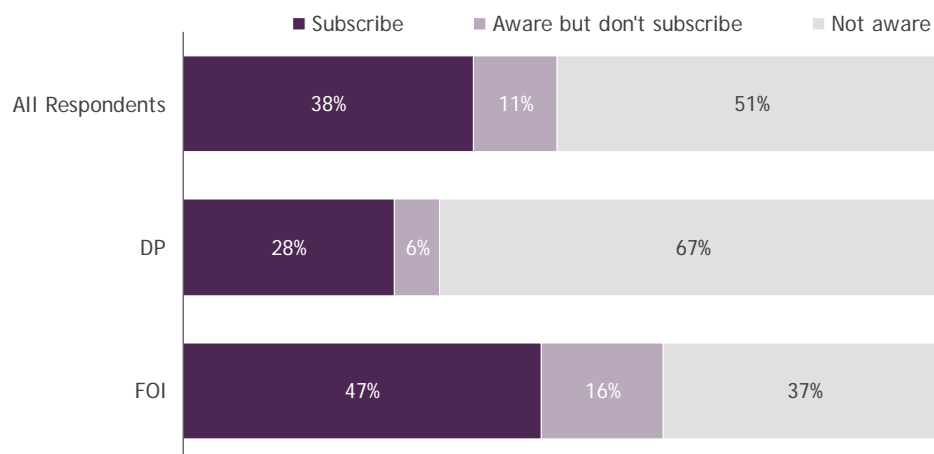
*“One hand does not always appear to talk to the other”* (FOI)

We will see later in the report that consistency of advice / guidance was an issue for many and it is likely that multiple contact points opens up the possibility for inconsistent advice, particularly in relation to FOI which is ‘newer’ than DP.

#### d) The e-newsletter

To understand awareness of/subscription to the e-newsletter, the sample was asked *“do you subscribe to the e-newsletter produced by the ICO?”* and *“Are you aware that an e-newsletter is produced?”*

The following chart illustrates levels of subscription and awareness, and clearly there are issues with awareness as just over half the sample (51%) are not aware of the newsletter.



Q4b. Do you subscribe to the e-newsletter produced by the Information Commissioner's Office?  
Q4c. Are you aware that an e-newsletter is produced?

\*Where figures do not add up exactly, this is due to rounding  
Base: Total (n=37), DP (n=18), FOI (n=19)

This is particularly an issue amongst the DP sub group with two thirds (67%) not aware and only 28% subscribing.

In contrast, the FOI stakeholders were more aware and actively subscribing (47%), but over one third (37%) of this group were still not aware of the e-newsletter.

It appears that there is untapped potential here and a need to upgrade awareness of, and subscription to, the e-newsletter across the sample, but in particular amongst the DP stakeholders.

Suggestions that were made by respondents to improve the value of the e-newsletter included:

- ▶▶ ability to print the e-newsletter in one document - e.g. a PDF version;
- ▶▶ provide more direction regarding where to find more detailed information, if required; and
- ▶▶ including Scottish content to increase relevance and interest in the region.

Within the open ended questions a number of respondents made comments in relation to the website. While some recognised and appreciated the recent improvements made, comments were still made around poor search functions and difficulties navigating / finding what they need. There was also interest in communicating via the website what is being worked on by the ICO as well as what has been completed, this tying in with previous comments that earlier notice / consultation could be of benefit to the relationship.

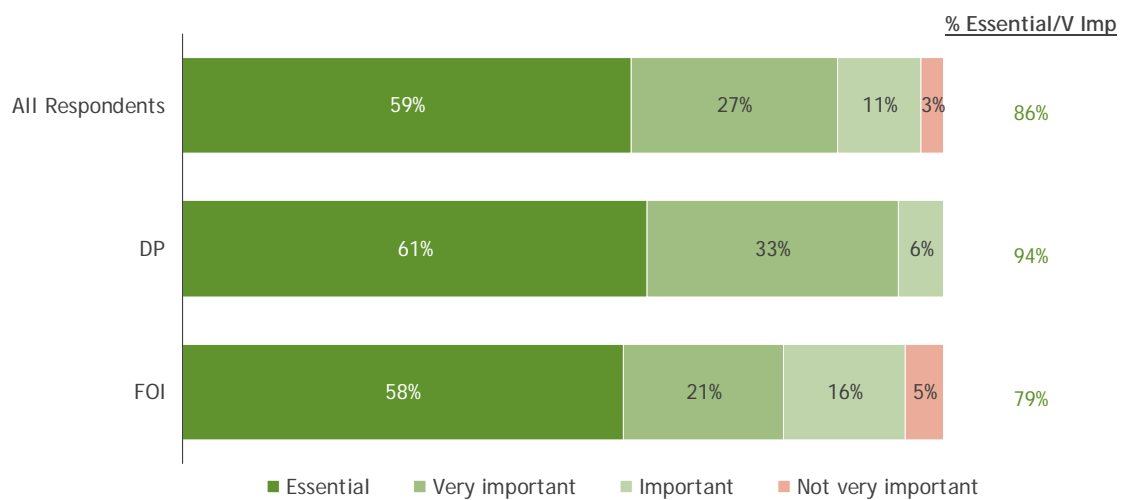
### e) Importance of Contact with the ICO

To help put the frequency and channel of communication into context, respondents were asked *“How important is the contact you have with the ICO in terms of helping you and/or your organisation to deliver your goals?”*

Reflecting a high regard for the role of the ICO, 86% rated their contact as ‘essential’ (59%) or ‘very important’ (27%) in assisting them to deliver their goals.

Looking at the sub groups, the DP stakeholders were more likely to rate importance of contact highly (DP 94% ‘essential/very important’, FOI 79% ‘essential/very important’). This appears to be in keeping with the more frequent level of contact that the DP stakeholders have with the ICO, i.e. there seems to be a greater degree of involvement with the ICO among DP stakeholders.

At the other end of the spectrum, only 5% of FOI stakeholders (and no DP stakeholders) rated contact as ‘not very important’, again indicating the high value placed by these individuals on their contact with the ICO.



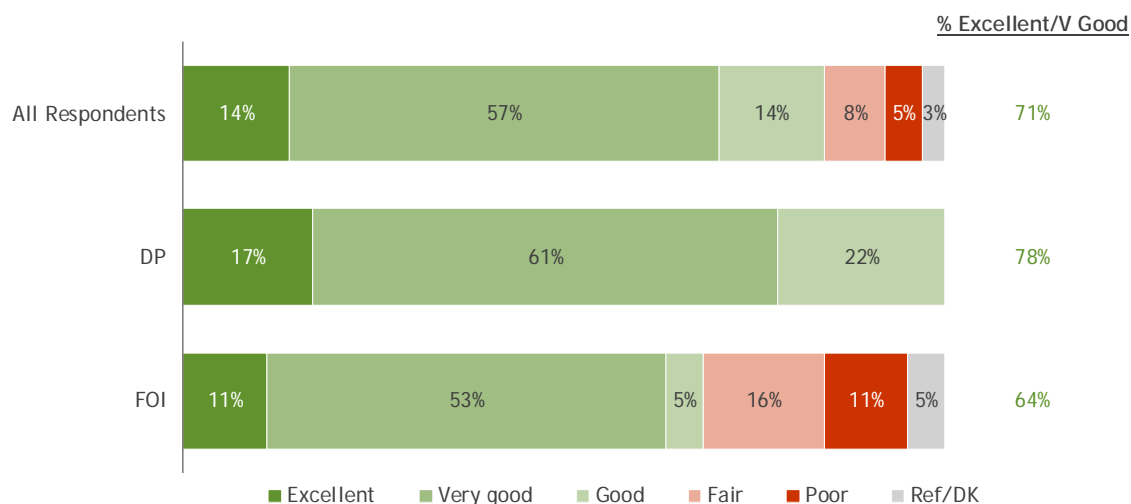
Q1e. How important is the contact you have with the ICO in terms of helping you and/or your organisation to deliver your goals?

\*Where figures do not add up exactly, this is due to rounding  
Base: Total (n=37), DP (n=18), FOI (n=19)

## 4 Performance Ratings

### a) Overall Performance Rating

Respondents were asked “Overall, taking everything into account, in terms of the advice they give you, your dealings with them and the quality of your relationship, how would you rate the overall performance of the ICO as an organisation?” The results of this question are shown in the following chart:



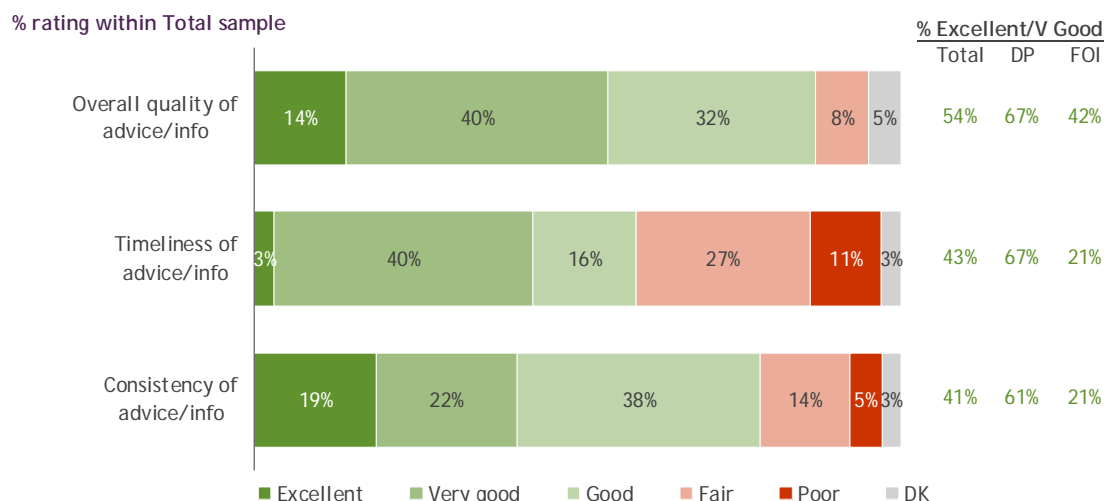
*Q5a. Overall, taking everything into account in terms of the advice they give you, your dealings with them and the quality of your relationship, how would you rate the overall performance of the Information Commissioner's Office as an organisation.*  
\*Where figures do not add up exactly, this is due to rounding  
 Base: Total (n=37), DP (n=18), FOI (n=19)

Encouragingly, there were relatively high levels of satisfaction across the total sample (71% rating 'excellent/very good'), with over three quarters (78%) of the DP stakeholders, and 64% of the FOI stakeholders giving a rating of 'excellent/very good'.

While the figures are positive overall, the FOI feedback was the more polarised of the two groups, with over one quarter (27%) rating performance as only 'fair' (16%) or 'poor' (11%). In contrast, none of the DP stakeholder group gave a rating below 'good'. Clearly there are issues within the FOI stakeholder group which need to be understood and addressed. Looking at subsequent questions, 'timeliness of advice and information' and 'consistency of advice and information' were comparatively bigger issues for this group.

### b) Quality, Timeliness and Consistency of Advice/Information

Following on from the previous question, the sample was asked to rate the performance of the ICO on a series of issues, using the same excellent to poor scale. The following chart shows the results for this question with respect to issues of quality, timeliness and consistency of advice/information.



*Q5b. Firstly, I'm going to read out a number of aspects relating to how you perceive the ICO to be performing and as I read each one I'd like you to tell me whether you think their performance in this area has generally been Excellent, Very Good, Good, Fair or Poor.*

*Base: Total (n=37), DP (n=18), FOI (n=19)*

*\*Where figures do not add up exactly, this is due to rounding*

Overall quality of advice and information was rated as 'excellent/very good' by just over half the sample (54%), with the DP stakeholder group more satisfied than the FOI group (DP 67%, FOI 42%). This gap in satisfaction was even more pronounced when looking at timeliness of advice/information (DP 67%, FOI 21%) and consistency of advice and information (DP 61% FOI 21%).

Looking in more detail at timeliness of advice/information, it is worth noting that only 3% of the sample rated this as 'excellent' - a more depressed figure than the others (quality overall 'excellent' 14%, consistency 'excellent' 19%) so clearly timeliness is an area to address across the sample, and particularly for the FOI stakeholders.

The qualitative feedback revealed a number of issues around timeliness and consistency of advice/information:

- ▶▶ There was a perceived lack of staff and resources which was identified as impacting on the ability of the ICO to respond quickly and meet the needs of stakeholders.
- ▶▶ There were also issues associated with response time - falling behind on initiatives generally, taking too long to respond to issues and resolve complaints (e.g. taking 2-3 years).
- ▶▶ In terms of consistency of advice and information, respondents requested more specific responses with clearer guidance relating to issues, and also mentioned examples of inconsistencies both in the quality of decision notices/advice given (which was not always seen to be in line with legislation) and within the advice given by different staff within the ICO and that stated within Guidance Notes.

The following illustrative quotations demonstrate the positive and the negative feedback from the sample. Overall, the feedback from the FOI stakeholders tended to be more negative than that of the DP stakeholders.

*“The individuals I have met are impressive, they are down to earth, hard working, easy to get along with, intelligent, professional and committed to what they are doing”* (FOI)

*“The decisions they come out with and the quality of guidance produced is very carefully worded and sensitively dealt with”* (FOI)

*“Any advice I ask for I always receive quickly and to a high quality - the standard is informed by knowledge and expertise”* (DP)

*“They come back very quickly and their advice is always sensible - they think the same way as us”* (DP)

*“Whenever I have asked for what I need they come back very quickly and I have not had to go and ask for more”* (DP)

*“Sometimes you do not get as prompt a response to queries as I would like, you expect 1 or 2 days later but sometimes it is a week later”* (FOI)

*“The advice is generally of a high standard. Sometimes guidance takes a long time but it is generally more important to get it right”* (DP)

*“The quality of the decision notices is highly variable; some of them are high quality well reasoned and internally coherent. Many of them are poor quality and show misunderstanding of the legal system”* (FOI)

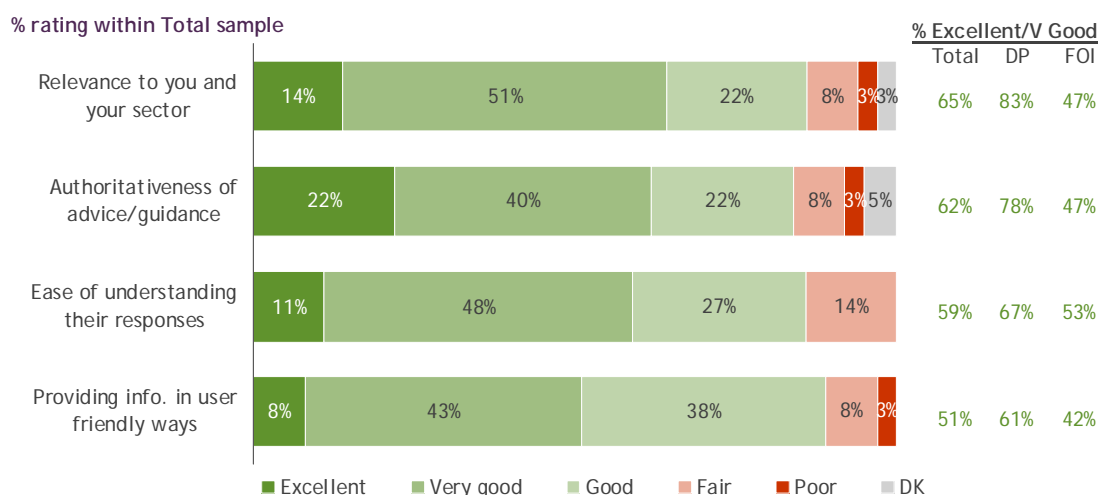
*“They struggle to meet high demand with limited resources which causes delay and frustration across xxxxx. When decision notices are issued they are well researched and clear though the considerable delays often undermine this excellent work”* (FOI)

*“The perception of their poor performance is affecting their role as regulator - people can't rely on their advice, if you ask two different people the same question you get two different answers”* (FOI)

*“Some of the decisions do not seem to be consistent or in line with legislation”* (FOI)

### c) Advice, Guidance and Information

The following chart illustrates the perceived performance of the ICO in relation to issues of advice, guidance and information.



Stakeholders typically saw the guidance as relevant, authoritative, reasonably user friendly and easy to understand.

The FOI stakeholders again gave lower ratings than their DP counterparts but, encouragingly, almost half gave ratings of 'excellent/very good', reflecting that the ICO's performance on these issues was significantly better than that for timeliness and consistency of information.

Looking in more detail at each statement, and starting with 'relevance to you and your sector', almost two thirds of the total sample (65%) rated the ICO as 'excellent/very good'. The contrast between the DP and FOI sub groups was especially marked here with 83% of DP stakeholders rating 'excellent/very good', and 47% of FOI stakeholders giving the same rating. A similar pattern is evident regarding 'authoritativeness of advice/guidance' (total 'excellent/very good' 62%, DP 78%, FOI 47%).

There is less difference, however, in opinion regarding 'ease of understanding their responses' (total 'excellent/very good' 59%, DP 67%, FOI 53%) and 'providing information in user friendly ways' (total 'excellent/very good' 51%, DP 61%, FOI 42%).

It is worth noting that although 59% rated 'ease of understanding their responses' as 'excellent/very good', 14% rated it as being only 'fair', perhaps pointing to a particular issue with ease of understanding among this minority.

Qualitative comments from the sample on these issues included the following feedback:

*“They do make complicated issues as easy as possible” (FOI)*

*“They are very conscientious and have a great deal of honesty and zeal” (FOI)*

*“The ICO general advice documents published on the internet are clear and concise” (FOI)*

*“From a layman’s perspective things are quite complex to explain but it is a very complex area so they are as good as they could be” (FOI)*

*“They are very accessible, approachable and easy to work with and always very willing and eager. They are always authoritative and reliable” (DP)*

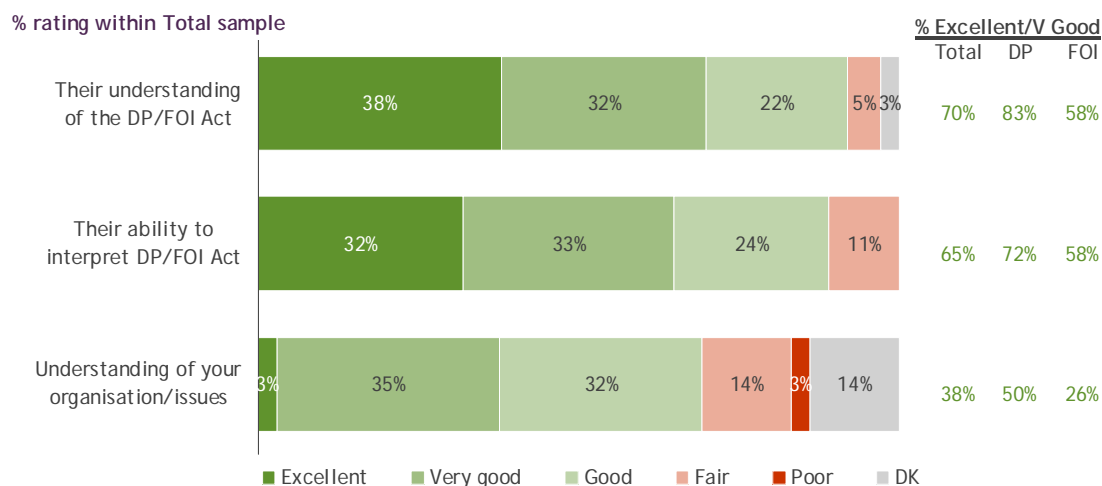
*“Feedback at conferences where they have been presenting has been very good” (DP)*

*“When I ask for information they are very definitive and authoritative and give advice on the basis of expert knowledge” (DP)*

*“Complexities in us being a devolved organisation (we are responsible for Scottish policy) often their advice is UK based rather than reflecting the issues in Scotland” (DP)*

### d) Knowledge

The following chart shows the ICO’s performance in relation to how stakeholders perceive the knowledge of the ICO staff they deal with.



Q7a. I'd now like you to think about the level of knowledge of the people you deal with at the ICO. As before, please rate each statement according to whether you feel that their performance is generally Excellent, Very Good, Good, Fair or Poor.  
Base: Total (n=37), DP (n=18), FOI (n=19)  
\*Where figures do not add up exactly, this is due to rounding

Generally, the sample felt that the ICO had a good understanding of the DP and FOI Acts (70% ‘excellent/very good’, 92% ‘excellent/very good/good’) and were able to interpret them (65% ‘excellent/very good’, 89% ‘excellent/very good/good’). As in previous

results, the DP stakeholders were more likely to rate the ICO higher than the FOI stakeholders.

Although less likely to be rated as 'excellent' (only 3%), there was an overall positive response to 'understanding (the stakeholder) organisation and issues' (70% 'excellent/very good/good'). It appears that stakeholders realise that the ICO is not able to understand each organisation in detail, but they do expect staff to listen, and consider specific circumstances, to have an understanding of the pressures and parameters within which they have to operate.

Specific qualitative feedback on these issues included:

*"We do not always agree but we can see the reason. They try hard to understand our sector but they do not always get it right. They could listen more, we try to tell them but it does not always sink in"* (FOI)

*"They have a good understanding even if they do not interpret the Act in the way we believe is correct. However, sometimes the more junior staff do not seem in touch with the political realities of Whitehall"* (FOI)

*"They have made progress in understanding our business but changes in personnel hinder this"* (DP)

*"There has been debate about what is personal information with a slight difference of opinion and emphasis but we understand their rationale"* (DP)

*"They are conscientious and pragmatic and intelligent in the way they interpret"* (FOI)

*"Clearly with the xxxx specific issues are complex and there have been occasions where the ICO has struggled to grasp the potential consequence of an information disclosure - although they will engage in sound consultation prior to making decisions"* (FOI)

## e) Accountability and Transparency

The following chart illustrates stakeholder perceptions of the ICO's performance in the areas of accountability and transparency.



Q8a. The next statements relate to the accountability of the ICO. As before please rate the statements in terms of whether they are typically Excellent, Very Good, Good, Fair or Poor in this area.

*Where figures do not add up exactly, this is due to rounding*  
 Base: Total (n=37), DP (n=18), FOI (n=19)

Rating scores were slightly lower here in comparison with previous performance ratings, with the 'degree to which they are accountable' rated as 'excellent/very good' by only 43% of the total sample. Interestingly, reversing the general trend, the FOI stakeholder were more likely to rate performance positively (total 43%, DP 33%, FOI 53%), this invariably reflecting the differences between the two Acts and the role that the ICO has in relation to DP i.e. often giving guidance rather than definitive responses. The full breakout of the scale for DP was excellent - 11%, very good - 22%, good - 44%, fair - 6% and don't know - 17%.

While more FOI than DP stakeholders give one of the top two scores, 21% of FOI stakeholders rated accountability as only 'fair', suggesting this is an area where improvements would be beneficial. This figure is higher than seen for the DP stakeholders (6%), this demonstrating a higher degree of polarisation among the FOI audience.

The overall response to 'transparency' was more positive in comparison (total 57% 'excellent/very good', DP 61%, FOI 53%).

Stakeholder verbatim comments relating to this area included:

*"They publish an annual report and it is good that they are willing to issue decisions against themselves" (FOI)*

*"I am particularly impressed by their postings of minutes to internal meetings" (FOI)*

*"Transparency is the whole point of their business so you assume it would be good" (FOI)*

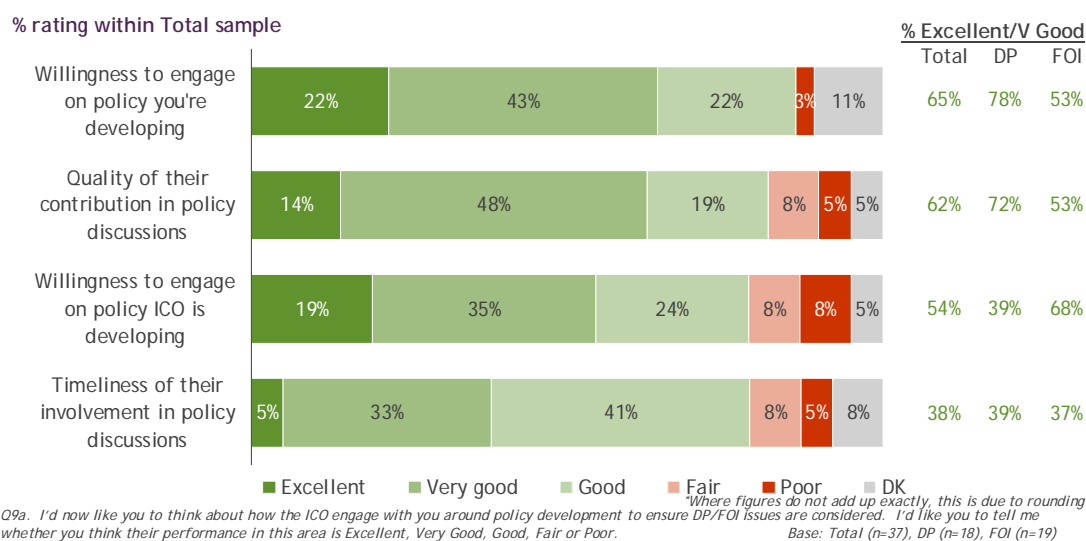
“They are very accessible, they have a high profile and decisions are published. They share information and take the lead” (DP)

“They need more resource in order to provide the right amount of accountability” (DP)

“Sometimes it is difficult to understand the ICO’s transparency and how they understand the bigger picture” (DP)

## f) Policy Engagement

ICO’s performance on issues related to how staff engage stakeholders around policy development, to ensure DP/FOI issues are considered, is shown in the following chart:



An encouraging response can be seen to the statements relating to ICO being willing to engage on policy that stakeholders are developing, and also the quality of their contribution. Just over 60% of the total sample rated ICO as ‘excellent/very good’ on these two issues (with a more positive rating among DP than FOI stakeholders).

A slightly less positive picture is evident for ‘willingness to engage on policy ICO is developing’ with just over half (54%) rating the ICO as ‘excellent/very good’ and a reversed pattern, in comparison with the other statements, here with DP stakeholders giving a lower rating than FOI stakeholders (DP 39% and FOI 68%). To some extent this reverse pattern will reflect the relative ages of the two Acts, with FOI still developing.

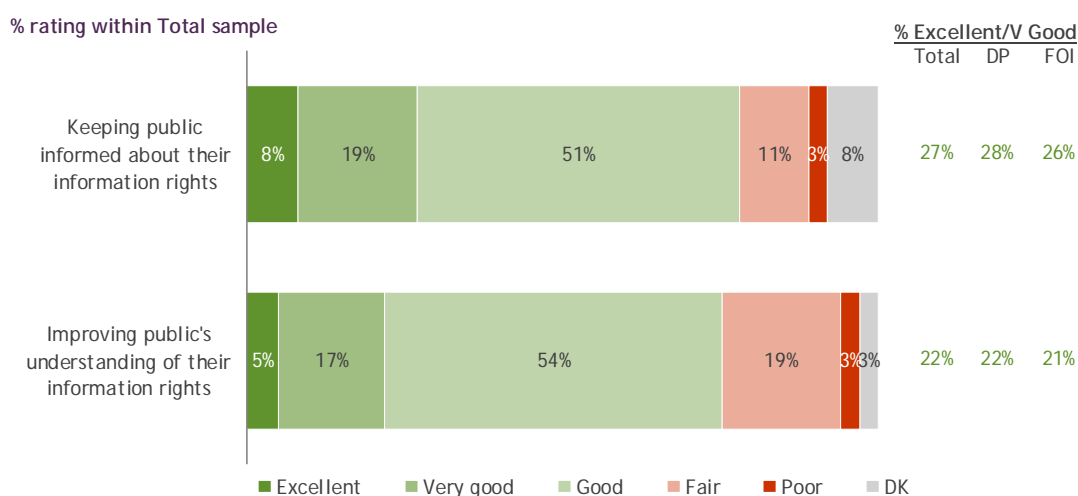
A more concerning result relates to ratings of the ICO in the ‘timeliness of their involvement in policy discussions’ with only 5% of the sample rating this ‘excellent’ and 38% ‘excellent/very good’ (unusually, this percentage is almost identical between the DP (39%) and the FOI sample (37%)). Although 79% rated ICO as ‘excellent/very good/good’, there is opportunity for improvement for both sub samples to raise the top end, ‘excellent’ rating scores.

A variety of suggestions were offered by the sample to help improve the ICO's policy engagements:

- ▶ **Earlier and wider consultation** - earlier to counteract the perception that consultation around policy, and prior to issuing documents, is seen to happen too late. Wider, for example, consultation with the public as well as the government and/or a better use made of other offices for example, the Welsh Office.
- ▶ **Greater clarity**, including being more clear on the objectives from the outset and identifying what each party is responsible for during the process.
- ▶ **An increase in pro-activity** demonstrated by the ICO, e.g. being more proactive in taking initiatives to the stakeholders and ensuring organisations were brought together to avoid overlap. Perhaps more of an overseeing role than being a partner.
- ▶ **Producing more specific guidelines** to assist in the development of local policy.

### g) Serving the Consumer

Respondents were asked to rate the performance of the ICO in terms of their relationship with the general public. The results of these questions are shown in the following chart:



Q10a. Thinking about their relationship with the public, how would you rate the ICO in terms of... I'd like you to tell me whether you think they are Excellent, Very Good, Good, Fair or Poor in this area. \*Where figures do not add up exactly, this is due to rounding Base: Total (n=37), DP (n=18), FOI (n=19)

The ICO is rated at a significantly lower level here than in other performance areas. The sample was much more likely to rate the ICO as good rather than excellent/very good in keeping the public informed and improving their understanding. The rating for both sub groups was similar to each other across the two statements. The lower figures here (for excellent / very good) are invariably influenced by these issues being somewhat removed

from the main relationship between the ICO and its stakeholders i.e. the stakeholders may not see all the work being done by the ICO.

Looking in more detail at the positive elements behind these issues:

- ▶▶ The ICO was considered to be performing well with the press. A belief that the ICO had a high profile in the media which had served to raise the profile of ICO issues in the public eye in a manner the 'man on the street' could understand. But, although the ICO was seen as reacting well, it was not necessarily identified as being proactive in raising its profile prior to this.
- ▶▶ Other praise was given for the website which was judged to provide clear information and guidance, and to have improved in recent years.
- ▶▶ The provision of explanatory leaflets was also viewed positively.
- ▶▶ Richard Thomas was praised for his high public profile.

On the other hand, there were some areas where the ICO could make improvements:

- ▶▶ Ideally, the ICO would work to achieve a higher profile generally, with an equal balance being placed on both DP and FOI to address the perception amongst some that coverage is in favour of DP over FOI. (It was expressed by some that the Scottish Information Commissioner had a higher profile and that the ICO could learn from them in this respect.)
- ▶▶ Work towards achieving a higher profile by putting more resource and funds into educating the public, clearly communicating that the ICO is a watchdog and separate from the government, engaging in more promotional activities across the board (including schools), building an increased media presence via PR and advertising, and becoming more proactive in educating the public about roles and responsibilities.
- ▶▶ Improve the accessibility of information - for example on the website there was a sense that you need to know what you are looking for, the written guides/information could be simplified and the availability of information 'off-line' could be extended.

Verbatim comments from stakeholders in relation to these issues included:

*"Leaflets and information on the website and the press office ensures that they have a high visibility in the media"* (FOI)

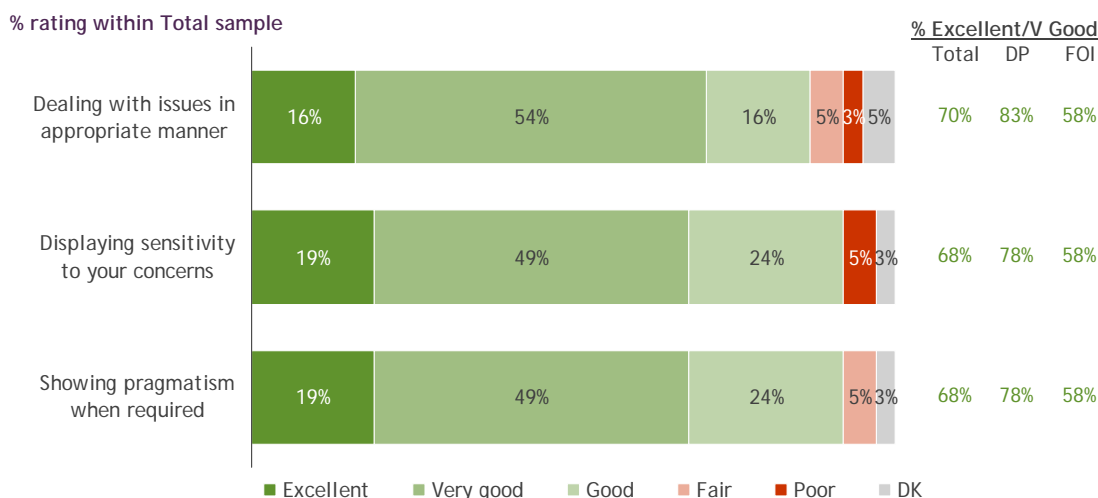
*"They are engaging proactively with the media to raise their profile and therefore the profile of the subject matter"* (DP)

*“They need to do it to the mass media market but they need a much bigger budget to achieve this. I am not criticising them because they don’t currently have the necessary funds” (DP)*

*“The accessibility of the website could be improved for the general public, when you go on you have to know what you are looking for to help you find it” (FOI)*

### h) Propriety and Proportionality

The sample was asked to rate the ICO on three issues relating to propriety and proportionality. The results to these questions are shown on the following chart:



Q11a. I'd now like you to think about the way that the ICO deal with you. So firstly how would you rate them in terms of...

\*Where figures do not add up exactly, this is due to rounding  
Base: Total (n=37), DP (n=18), FOI (n=19)

Generally the ICO was seen to act with sensitivity, pragmatism and in an appropriate manner. As with most other issues, the FOI stakeholders gave lower ratings, however almost 60% did still rate the ICO as ‘excellent/very good’ in these areas - one of the most positive sets of ratings from the FOI sub group.

Encouragingly, the ICO was rated as ‘excellent/very good’ by the majority of the sample on each of the statements - ‘dealing with issues in an appropriate manner’ (total 70% ‘excellent/very good’, DP 83%, FOI 58%), ‘displaying sensitivity to your concerns’ (total 68%, DP 78%, FOI 58%) and ‘showing pragmatism when required’ (total 68%, DP 78%, FOI 58%). None rated the ICO as ‘poor’ on the last statement.

Verbatim feedback on these issues included:

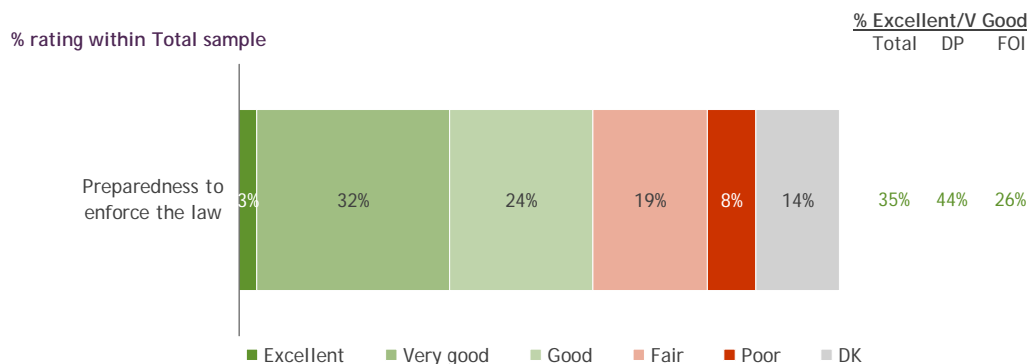
*“Again it tends to be where we have asked for information and support and they have been good, particularly recently. We have been talking about running seminars about database compromise and they have been helpful in saying how they could fit into the agenda and move things forward” (DP)*

*"We appreciate the robust approach to case handling" (FOI)*

*"They are able to take a pragmatic approach which balances the political reality with pure data protection law" (DP)*

## i) Enforcement

Respondents were also asked to rate the ICO in terms of its preparedness to enforce the law.



Q12a. And how would you rate the Information Commissioner's Office in terms of... ?

*Where figures do not add up exactly, this is due to rounding*  
Base: Total (n=37), DP (n=18), FOI (n=19)

The results for this issue are on a similar, low, level to the ICO's performance in respect to its relationship with the general public.

Only 3% of the sample rated 'excellent' and 35% 'excellent/very good' (DP 44%, FOI 26%). Almost a third (27%) rated the ICO as 'fair/poor' and a fairly high proportion (14%) claimed not to know.

Overall, stakeholders had mixed views as to whether the ICO is prepared to enforce the law. FOI stakeholders were particularly likely to be unconvinced in this regard.

Within the verbatim comments, the ICO was identified as improving in this area and increasingly prepared to take on difficult cases and show more strength. However, there was still a sense that this needs to be on-going and improved upon, with the ICO needing more power to take action where required.

Stakeholder verbatim comments on this issue include:

*"Until recently people ignored compliance because the risk was very small. The ICO needs much more resources (to police it)" (DP)*

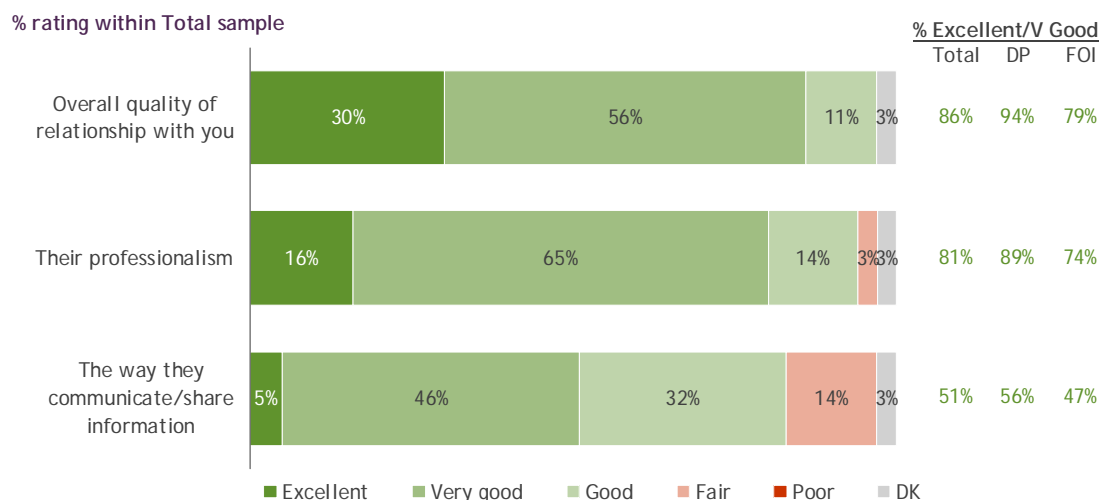
*"A building society lost a laptop but the ICO only gave them a slap on the wrist. In an equivalent case, the Nationwide did the same and got a fine of £1m from the FSA" (DP)*

*“Inability to enforce in a timely manner, insufficient resources that have caused a huge backlog affecting credibility of legislation and lack of enforcement in key areas which has generated a degree of lethargy with senior managers” (FOI)*

*“They need more resources and statutory powers to enforce the law and better legislation” (DP)*

## j) Relationships

To further understand certain aspects of the working relationship between stakeholders and the ICO, stakeholders were asked to rate the ICO on these three areas:



*Q13a. I'd now like you to think about the working relationship you have with the ICO. Using the same scale of Excellent, Very Good, Good, Fair or Poor. So firstly how would you rate them in terms of...*

*\*Where figures do not add up exactly, this is due to rounding*  
*Base: Total (n=37), DP (n=18), FOI (n=19)*

Overall, the ICO appeared to have good strong relationships with its stakeholders, with 30% of the total sample rating the overall quality of relationship as ‘excellent’, and 86% rating that relationship as ‘excellent/very good’ (and this is the highest ‘excellent/very good’ rating seen across any of the individual issues). Within this, and as might be expected following the pattern of most other results, the DP stakeholder sample rated the relationship more highly than the FOI sample (DP 94% ‘excellent/very good’, FOI 79%)

The ICO’s professionalism was also rated very well across both sub groups, with the DP stakeholders being somewhat more positive (total 81% ‘excellent/very good’, DP 89%, FOI 74%).

In contrast to these results, only half the sample (51%) rated ‘the way they communicate/share information’ as being ‘excellent/very good’, suggesting that this is another opportunity for improvement. Here the DP and the FOI stakeholders were only nine percentage points apart (DP 56%, FOI 47%) indicating that this is a potential issue for both groups. To support this, 14% thought communication/sharing of information was only ‘fair’.

Good relationships were based on a number of factors valued by the sample:

- ▶ **Regular and meaningful contact** was key, including keeping stakeholders informed of issues and concerns, especially being proactive about communications, for example calling to talk and update. Face to face meetings were valued where deemed necessary, as were dedicated points of contact within the organisation and willingness to build up a relationship with stakeholders.
- ▶ **Willingness to engage** was also key, manifesting itself most effectively via a willingness to talk and advise, be open to requests, open about processes (sharing information, open lines of communication), seek out stakeholders' views and listen to their input. Overall, an openness with a non judgemental approach based on good personal relations would be recommended.
- ▶ **Timely feedback and responses** were also valued in the relationship, or feedback if there were any delays i.e. effective management of expectations.

Specific comments here included:

*"They are always willing to talk and provide sensible advice. They are working to the same goal as us"* (DP)

*"They are ready to make themselves available for face to face discussions. We are a complex organisation and they have a 'good touch' with us with them considering some of our requests"* (DP)

*"I have a dedicated contact point so any queries I have I can contact that person. Their responses are very prompt and of a high quality - I find they are very open and willing to share information"* (DP)

*"They are transparent, open, and accurate. It is a mutually beneficial two way thing."* (FOI)

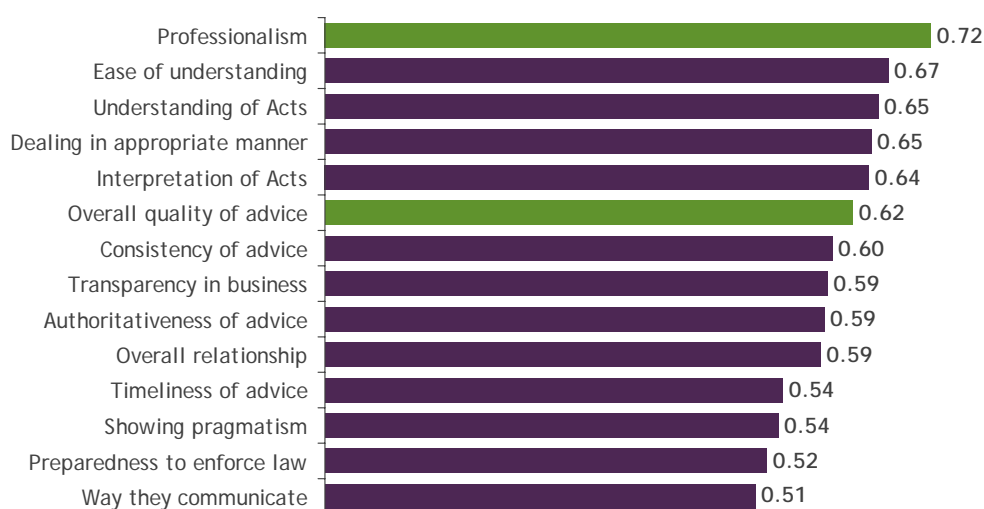
*"They try to build relationships and take our views into account"* (FOI)

## k) Drivers Analysis

Overall, stakeholders were asked to rate ICO's performance, from 'excellent' to 'poor', on 25 individual attributes as well as ICO's overall performance - the results of these individual questions has been discussed in the previous sections of this report.

In order to better understand which of these specific aspects were the key drivers of the overall performance score, the data from these questions was subjected to two statistical techniques, correlation and regression analysis.

Analysis showed a high degree of **correlation** between the overall performance score and over half of the attributes rated. The correlation coefficients for these attributes are shown graphically in the following chart:



Q5b/6a/7a/8a/9a/10a/11a/12a/13a

Base: Total (n=37)

This high level of correlation between the overall performance score and scores on many of the individual issues suggests that the measurement of performance on relatively few attributes would actually be needed to 'predict' the overall performance score.

**Regression analysis** was also carried out with the intention of highlighting those issues that are of greatest importance in driving the overall performance score. By understanding this issue, the ICO can ascertain where the greatest benefit can be derived from future improvement initiatives.

This regression analysis showed that changes in performance in most areas would ultimately have an impact on the overall score. The only areas which appeared to have a relatively weak link to overall performance were those relating to informing the public and engaging in policy discussions.

The two key drivers of overall opinion were:

- ▶▶ quality of advice and information; and
- ▶▶ professionalism.

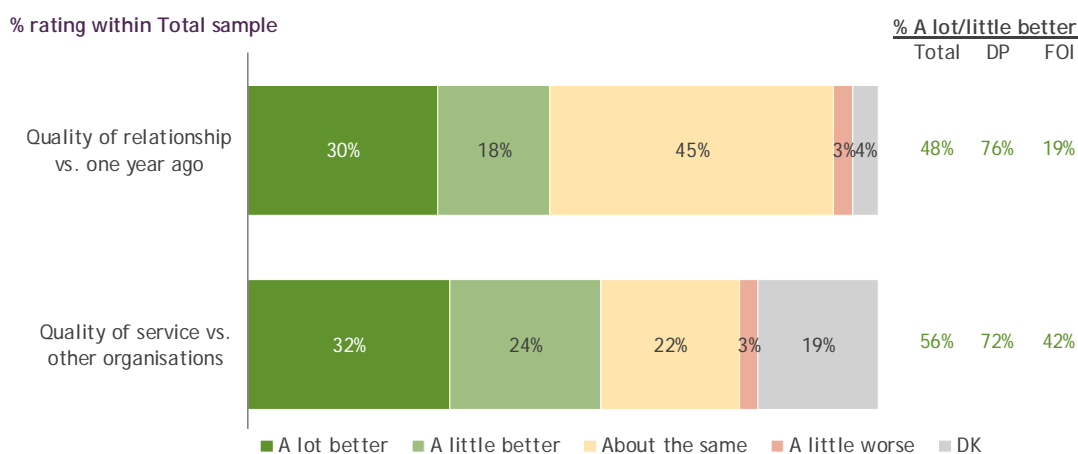
Performance levels in relation to professionalism are currently very high (total 81% 'excellent/very good', DP 89%, FOI 74%) so it may prove difficult to achieve significant improvements here, but it will be important to at least maintain current levels of performance.

The issue of 'quality of advice/information' shows more room for improvement, especially among the FOI group, with just over half the total sample (54%) rating ICO as 'excellent/very good' (DP 67%, FOI 42%).

While these two drivers are the key ones, the data shows that, in effect, many attributes have a link to the overall perceptions, so relatively few can be given a low priority. The data also tells us that in identifying the attributes to measure, nothing important has been missed i.e. the 25 attributes chosen cover most, if not all, the needs of the stakeholders.

### I) Comparative Performance Ratings

To help identify any movement in relationship over the past year and to put that relationship in context, stakeholders were asked to rate the quality of their relationship with the ICO compared to a year ago, and to rate the quality of service provided by the ICO compared to that of other organisations they had dealt with generally.



Q14a. Overall, in comparison to a year ago, would you say the quality of your relationship with the ICO is...  
 Q15. And how would you compare the quality of service provided by the ICO with that of other organisations you have dealt with generally. Would you say their service is...

Base: Total (n=33), DP (n=17), FOI (n=16)

Base: Total (n=37), DP (n=18), FOI (n=19)

Firstly, looking at the comparison with a year ago, nearly half the sample felt that there had not been any change (45% 'about the same'), and only a small proportion thought it had deteriorated (3% 'a little worse').

Encouragingly, almost half the sample believed that the quality of relationship had improved with nearly one third (30%) of the total sample believing that the relationship was 'a lot better' than one year ago. The DP stakeholders were much more likely to claim an improvement over the last year (76% DP, 19% FOI), so clearly there needs to be efforts made with the FOI stakeholders as they are generally less satisfied than the DP stakeholders and are not seeing any strong signs of improvement.

The main reasons for the improvement in quality of the relationship appeared to be familiarity and understanding of the scope of each organisation involved; being willing to engage with stakeholders and getting to know them appears to be key, as many of the following quotes illustrate:

*"We know each other a little better"* (DP)

*"The relationship has built up over time"* (DP)

*"We understand more about them and they have increased their resources"* (DP)

*"We have more contact with people at the top end"* (FOI)

*"Because a partnership is developing and more people are aware of our needs and aspirations"* (DP)

*"A year ago we didn't have a relationship. The two sets of policy people have got together and now have a dialogue"* (DP)

*"They are more approachable. We both have worked hard at better understanding issues"* (DP)

*"The more junior staff have stopped being difficult and there is more flexibility on response times, they engage more and are more aware of the constraints we work under"* (FOI)

Looking at the quality of service offered by the ICO in comparison with other organisations also provides an encouraging picture with 56% of the total sample agreeing that ICO was 'a lot/little better' than others, and only 3% believing that the ICO was 'a little worse'.

Again, the score for the FOI stakeholders was depressed in comparison with the DP stakeholders (FOI 'a lot/little better' 42%, DP 72%) highlighting the need for the FOI sub group to be better supported.

## 5 Perceived Strengths and Areas to Address within the ICO

Respondents were invited to focus on overall strengths and weaknesses of the ICO to help clarify their views.

### Strengths

As illustrated in the comparative performance ratings earlier, there has clearly been an upward shift in perception of the ICO over the past year for many, and throughout the report, many positive attributes have emerged.

Although the DP stakeholders appeared to consistently rate the ICO more highly than the FOI stakeholders, both sub groups generated a list of valued strengths for the ICO to maintain and build on.

For clarity, we have listed these strengths below:

- ▶ open
- ▶ willing to engage
- ▶ helpful
- ▶ friendly
- ▶ accessible
- ▶ building good relationships
- ▶ doing well given the resources available
- ▶ demonstrating expertise in the area - so increasing trust in personnel and processes, and credibility for the ICO generally
- ▶ beginning to show more courage
- ▶ pragmatic
- ▶ prepared to be flexible
- ▶ well respected
- ▶ professional
- ▶ independent
- ▶ committed
- ▶ strong leadership
- ▶ responsive (DP)

Some specific comments which further illustrate these feelings are:

*“They are well respected and the industry pays attention to what they say. They make complicated things simpler” (DP)*

*“They have a very good figurehead and I know what they are talking about” (FOI)*

*“They have their finger on the pulse on what is happening in our areas of concern and they are willing to be flexible” (DP)*

*“Their expertise in the area and ability to express and deal with complex issues in a straightforward manner. Their ability to understand people they are dealing with and their issues” (DP)*

*“They have a good management team that looks at the commercial perspective. They are more willing to engage with us” (DP)*

*“Good approach and good at building relationships, they have settled in well and got to know a lot of our people. They will always seek an answer to any question we ask” (DP)*

### Areas to address

The weaknesses identified by the sample focussed on desire for increased proactiveness and improved processes (to ensure timeliness) and more consistency in advice.

Whilst praised for progress made to date in terms of openness, willingness to engage, expertise, leadership and a general move forward in raising profile, there were issues at a more specific level which stakeholders felt the ICO should address.

Areas to address were highlighted as follows

- ▶▶ An increase in resource or funding available - some feeling that resources are limited and hence the ICO appears overstretched and this in turn can generate a backlog of work and delays. ICO unable to keep to deadlines or progress issues to meet the timescales of the stakeholders.
- ▶▶ Increased power given to the ICO to take action.
- ▶▶ Improved consistency, across the ICO:
  - ▶ consistency in standard and accuracy of advice given;
  - ▶ in the quality of advice and outputs; and
  - ▶ in staff - ensuring all levels communicate the same message or solution.
- ▶▶ More regular and proactive contact:
  - ▶ ensuring regular meetings with key stakeholders for involvement, information and relationship building;
  - ▶ more regular informal contact to build relationship and trust;
  - ▶ attending/listening/reacting to stakeholder views more often; and

- ▶ communicating realistic timescales and informing stakeholders if there are delays expected - an open and honest relationship with expectations constantly managed.

The following comments highlight some of these issues:

*"Lack of funding - which means they are not able to employ such good people at lower levels and significant delays at the lower end. The people dealing with case work."* (FOI)

*"They probably need more funding"* (FOI)

*"They are under resourced - so we can't always get the right person. Possibly they could have made more effort to see how we were doing."* (FOI)

*"They have a backlog of Freedom of Information cases. This may be caused by a lack of staff"* (FOI)

*"(the issue is...) the constant changes in staff who have to be re-educated"* (FOI)

*"There is an uneven grasp of the subject by different people"* (FOI)

*"The support from case officers needs to have more influence, more engagement and delegation"* (DP)

*"They do not have enough power to take action quickly for example with fines"* (DP)

## Appendix - Questionnaire



**JIGSAW RESEARCH LIMITED**  
13-14 Margaret Street, London, W1W 8RN  
Tel: 020 7291 0810

V2 – FEB 25 2008

**INFORMATION COMMISSIONER'S OFFICE**  
**Stakeholder Perception Study**  
**Questionnaire**

**Interviewer Name :** \_\_\_\_\_ **I.D. No.** \_\_\_\_\_  
**Respondent Name :** \_\_\_\_\_

**INTERVIEWER DECLARATION**

I declare that this interview has been conducted strictly in accordance with your specifications within the MRS Code of Conduct and with a person totally unknown to me.

Signed (**INTERVIEWER**): \_\_\_\_\_ Date \_\_\_\_\_

**INTRODUCTION**

Good morning/afternoon/evening. My name is \_\_\_\_\_, calling on behalf of Jigsaw Research, an independent market research agency based in London. We have been given your contact details by the Information Commissioner's Office who I believe have been in touch with you recently with regard to a research study we are conducting on their behalf. We have been asked to carry out a short interview regarding their performance and reputation. Could I ask you a few questions?

**IF YES, CONTINUE**

**IF NO, ARRANGE A TIME FOR CALLBACK IF POSSIBLE**

**BACKGROUND & CONTACT**

- Q1a. Sample Taken From
- Freedom of Information list .....1
  - Data Protection list.....2

Q1b. Organisation work for (**DO NOT ASK – WRITE IN FROM SAMPLE**)

Q1c. Main areas work with? **DO NOT ASK – CODE FROM SAMPLE**

Q1d. When did you personally first start having contact with the Information Commissioner’s Office? **SINGLE CODE**

- Within the last year .....1
- 1-2 years ago .....2
- 3-5 years ago .....3
- 6-10 years ago .....4
- Over 10 years ago .....5
- Don’t know .....6

Q1e. How important is the contact you have with the Information Commissioner’s Office in terms of helping you and/or your organisation to deliver your goals? Would you say.....**READ OUT. SINGLE CODE.**

- It is essential to my role .....1
- Very important.....2
- Important.....3
- Not very important.....4
- Not at all important – it has very little impact .....5
- Don’t Know (DO NOT READ OUT) .....6

Q2. Can you **briefly** describe the nature of the dealings you have with the Information Commissioner’s Office. **IF NOT COVERED/OR STRUGGLING** – What types of issues do you address with them? Is it a two way relationship or is one party helping more than the other? **INTERVIEWER – TYPE IN ANSWER VERBATIM**

- Q3a. On average, how frequently do you have written contact, via letter or email, with the Information Commissioner’s Office? **CODE CLOSEST. SINGLE CODE.**
- Q3b. On average, how frequently do you have telephone contact? **CODE CLOSEST. SINGLE CODE.**
- Q3c. How frequently do you have face-to-face contact? **CODE CLOSEST. SINGLE CODE**

Daily contact .....	1	1	1
Several times a week .....	2	2	2
About once a week .....	3	3	3
A few times a month .....	4	4	4
About once a month.....	5	5	5
Once every 2 or 3 months (4-6 times a year) .....	6	6	6
Once every 4 – 6 months (2-3 times a year) .....	7	7	7
Once a year or less.....	8	8	8
Don't know .....	9	9	9

- Q3d Using a scale of too much, about right or too little, how would you rate the level of contact you have with the Information Commission’s Office via each of the following channels.....**READ OUT. SINGLE CODE**

	Too Don't Much Know	About Right	Too Little	
Written contact by e-mail or by post .....	1	2	3	4
Telephone contact .....	1	2	3	4
Face-to-face contact .....	1	2	3	4

- Q4a. And in general, does your contact with the Information Commissioner’s Office involve having contact with ... ? **READ OUT. SINGLE CODE**

Just one person .....	1
2-3 different people.....	2
4 or more different people.....	3
Don't know (DON'T READ).....	4

- Q4b. Do you subscribe to the e-newsletter produced by the Information Commissioner’s Office?. **SINGLE CODE**

Yes.....	1
No.....	2

**IF NO AT Q4b ASK Q4c.**

- Q4c. Are you aware that an e-newsletter is produced?

Yes.....	1
No.....	2

Q4d. Do you have any suggestions for ways in which the Information Commissioner’s Office could enhance or improve the way they communicate with people such as yourself?

**Performance Levels**

Q5a. Overall, taking everything into account in terms of the advice they give you, your dealings with them and the quality of your relationship, how would you rate **the overall performance** of the Information Commissioner’s Office as an organisation. Would you say that they are.... **READ OUT. SINGLE CODE**

- Excellent ..... 1
- Very good..... 2
- Good ..... 3
- Fair ..... 4
- Poor ..... 5
- DO NOT READ**
- Refused..... 6
- Don’t know ..... 7

READ OUT: We are now going to explore your perceptions of the Information Commissioner’s Office in a number of core areas. For each area there will be a series of statements where we ask you to rate their performance, followed by the opportunity to provide any comments to allow you to expand on these answers in your own words.

Q5b. Firstly, I’m going to read out a number of aspects relating to how you perceive the Information Commissioner’s Office to be performing and as I read each one I’d like you to tell me whether you think their performance in this area has generally been Excellent, Very Good, Good, Fair or Poor. **SINGLE CODE**

So firstly how would you rate.....**READ OUT FIRST STATEMENT.** And how would you rate.... **READ OUT OTHER STATEMENTS**

**RANDOMISE ORDER**

Excellent Very Good Good Fair Poor Don't Know

- The overall quality of the advice & information they provide ..... 1 ..... 2 ..... 3 ..... 4 ..... 5 ..... 6
- The consistency of the advice/information they provide..... 1 ..... 2 ..... 3 ..... 4 ..... 5 ..... 6
- The timeliness of their advice and information ..... 1 ..... 2 ..... 3 ..... 4 ..... 5 ..... 6

Q5c. Do you have any specific comments around these issues?

**Advice, Guidance & Information**

Q6a. I'd now like you to think in more detail about the advice, guidance and information you have received from the Information Commissioner's Office. I'm going to read out a number of statements and as I read each one I'd like you to tell me whether you think their performance in this area is typically Excellent, Very Good, Good, Fair or Poor. **SINGLE CODE**

So firstly how would you rate.....**READ OUT FIRST STATEMENT.** And how would you rate.... **READ OUT OTHER STATEMENTS**

**RANDOMISE ORDER**

	Excellent	Very Good	Good	Fair	Poor	Don't Know
Ease of understanding their responses .....	1	2	3	4	5	6
The authoritativeness of their advice and guidance .....	1	2	3	4	5	6
Providing information in ways which are user friendly.....	1	2	3	4	5	6
Relevance to me and my sector .....	1	2	3	4	5	6

Q6b. Do you have any specific comments around these issues?

**Knowledge**

Q7a. I'd now like you to think about the level of knowledge of the people you deal with at the Information Commissioner's Office. As before, please rate each statement according to whether you feel that their performance is generally Excellent, Very Good, Good, Fair or Poor. SINGLE CODE

So firstly how would you rate.....**READ OUT FIRST STATEMENT.** And how would you rate.... **READ OUT OTHER STATEMENTS. RANDOMISE ORDER**

Excellent Very Good Fair Poor Don't Know

- Their understanding of the \_\_\_\_\_[INSERT Data Protection OR Freedom Of Information DEPENDING ON WHICH SAMPLE DRAWN FROM] Act .....1 ..... 2..... 3.....4 .....5 ..... 6
- Their ability to interpret the \_\_\_\_\_[INSERT Data Protection OR Freedom Of Information DEPENDING ON WHICH SAMPLE DRAWN FROM] Act .....1 ..... 2..... 3.....4 .....5 ..... 6
- Their understanding of your organisation and internal issues .....1 ..... 2..... 3.....4 .....5 ..... 6

Q7b. Do you have any specific comments around these issues?

**Accountability**

Q8a. The next statements relate to the accountability of the Information Commissioner's Office. **(IF NECESSARY:** As before please rate the statements in terms of whether they are typically Excellent, Very Good, Good, Fair or Poor in this area). SINGLE CODE

So firstly how would you rate.....**READ OUT FIRST STATEMENT.** And how would you rate.... **READ OUT OTHER STATEMENTS**

**RANDOMISE ORDER**

Excellent Very Good Fair Poor Don't Know

- The degree to which they are accountable .....1 ..... 2..... 3.....4 .....5 ..... 6
- The transparency in the way they carry out their business .....1 ..... 2..... 3.....4 .....5 ..... 6

Q8b. Do you have any specific comments around these issues?

**Policy Engagement**

Q9a. I'd now like you to think about how the Information Commissioner's Office engage with you around policy development to ensure \_\_\_\_\_ [INSERT Data Protection OR Freedom Of Information DEPENDING ON WHICH SAMPLE DRAWN FROM] issues are considered. (IF NECESSARY: I'd like you to tell me whether you think their performance in this area is Excellent, Very Good, Good, Fair or Poor). SINGLE CODE

So firstly how would you rate.....**READ OUT FIRST STATEMENT.** And how would you rate....  
**READ OUT OTHER STATEMENTS**

**RANDOMISE ORDER**

	Excellent	Very Good	Good	Fair	Poor	Don't Know
Their willingness to engage with you in relation to policy that <b>you</b> are developing .....	1	2	3	4	5	6
Their willingness to engage with you in relation to policy that the <b>Information Commissioner's Office</b> is developing .....	1	2	3	4	5	6
The timeliness of when they become involved in discussions about policy with you .....	1	2	3	4	5	6
The quality of their contribution in relation to policy discussions with you .....	1	2	3	4	5	6

**ONLY ASK Q9B IF GIVE A RATING OF EXCELLENT/VERY GOOD (CODED 1 OR 2) AT ANY OF THE AREAS IN Q9A**

Q9b. What is the most recent example of where they have engaged successfully with you on policy? **PROBE:** What made these engagements successful? **WRITE IN VERBATIM COMMENTS IN FULL.**



**ONLY ASK Q9C IF GIVE A RATING OF GOOD/FAIR/POOR AT ANY OF THE AREAS IN Q9A**

Q9c. What improvements would you like to see in relation to the Information Commissioner's Office's dealings with you in regarding policy ? **WRITE IN VERBATIM COMMENTS IN FULL.**

**IF SCORED 4 OR 5 TO ANY OF THE AREAS AT Q9a AND NOT COVERED BY THEIR INITIAL ANSWER: PROBE WHY DID YOU RATE 'XXX' AS FAIR/POOR RATHER THAN EXCELLENT OR GOOD.**



**Serving The Consumer**

Q10a. Thinking about their relationship with the public, how would you rate the Information Commissioner’s Office in terms of .....**READ OUT FIRST STATEMENT.** And how would you rate.... **READ OUT OTHER STATEMENTS**

(IF NECESSARY I’d like to tell me whether you think they are Excellent, Very Good, Good, Fair or Poor in this area)

**RANDOMISE ORDER**

		Excellent	Very Good	Good	Fair	Poor	Don't Know
The degree to which they keep the public informed about their information rights .....	1	2	3	4	5	6	
Their efforts to improve the public’s understanding of their information rights .....	1	2	3	4	5	6	

**ONLY ASK Q10B IF GIVE A RATING OF EXCELLENT/VERY GOOD (CODE 1 OR 2) AT ANY OF THE AREAS IN Q10A**

Q10b. What are they doing particularly well in terms of educating the public and keeping them informed? **WRITE IN VERBATIM COMMENTS IN FULL.**

**ONLY ASK Q10C IF GIVE A RATING OF GOOD/FAIR/POOR IN ANY OF THE AREAS AT Q10A**

Q10c How would you like to see the Information Commissioner’s Office improving with regard to educating and informing the general public? **WRITE IN VERBATIM COMMENTS IN FULL.**

**IF SCORED 4 OR 5 TO ANY OF THE AREAS AT Q10a AND NOT COVERED BY THEIR INITIAL ANSWER: PROBE WHY DID YOU RATE ‘XXX’ AS FAIR/POOR RATHER THAN EXCELLENT OR GOOD.**

**Propriety & Proportionality**

Q11a. I'd now like you to think about the way that the Information Commissioner's Office deal with you. (IF NECESSARY Excellent, Very Good, Good, Fair or Poor). SINGLE CODE

So firstly how would you rate them in terms of.....**READ OUT FIRST STATEMENT.**  
And how would you rate.... **READ OUT OTHER STATEMENTS**

**RANDOMISE ORDER**

	Excellent	Very Good	Good	Fair	Poor	Don't Know
Displaying sensitivity to your concerns.....	1	2	3	4	5	6
Dealing with issues in an appropriate manner .....	1	2	3	4	5	6
Showing pragmatism when required .....	1	2	3	4	5	6

Q11b. Do you have any specific comments around these issues?

**Enforcement**

Q12a. And how would you rate the Information Commissioner's Office in terms of.....SINGLE CODE

	Excellent	Very Good	Good	Fair	Poor	Don't Know
Their preparedness to enforce the law to ensure compliance.....	1	2	3	4	5	6

**ONLY ASK Q12b IF GIVE A RATING OF GOOD/FAIR/POOR AT Q12A**

Q12b Can you give an example of where you feel they should have enforced the law but they didn't? **WRITE IN VERBATIM COMMENTS IN FULL.**

**Relationships**



Q13a. I'd now like you to think about the working relationship you have with the Information Commissioner's Office (IF NECESSARY Using the same scale of Excellent, Very Good, Good, Fair or Poor). **SINGLE CODE**

So firstly how would you rate them in terms of .....**READ OUT FIRST STATEMENT.**  
And how would you rate.... **READ OUT OTHER STATEMENTS**

**RANDOMISE ORDER**

Excellent Very Good Good Fair Poor Don't Know

The overall quality of their relationship with you ..... 1 ..... 2 ..... 3 ..... 4 ..... 5 ..... 6  
Their professionalism..... 1 ..... 2 ..... 3 ..... 4 ..... 5 ..... 6  
The way in which they communicate with you and share information ..... 1 ..... 2 ..... 3 ..... 4 ..... 5 ..... 6

**ONLY ASK Q13b IF GIVE A RATING OF EXCELLENT/VERY GOOD (CODED 1 or 2) AT ANY OF THE AREAS IN Q13a**

Q13b. What are they doing particularly well in terms of the relationship you have with them and their willingness to engage? **PROBE:** Anything else? **WRITE IN VERBATIM COMMENTS IN FULL.**



**ONLY ASK Q13C IF GIVE A RATING OF GOOD/FAIR/POOR AT ANY OF THE AREAS IN Q13A**

Q13c How would you like to see them improving their relationship with you? **PROBE:** Anything else? **WRITE IN VERBATIM COMMENTS IN FULL.**

**IF SCORED 4 OR 5 TO ANY OF THE AREAS AT Q13a AND NOT COVERED BY THEIR INITIAL ANSWER: PROBE WHY DID YOU RATE 'XXX' AS FAIR/POOR RATHER THAN EXCELLENT OR GOOD.**



**ONLY ASK Q14a/Q14b OF THOSE THAT HAVE BEEN DEALING WITH THE ICO FOR MORE THAN A YEAR AT Q1d (CODES 2-5)**

Q14a. Overall, in comparison to a year ago, would you say the quality of your relationship with the Information Commissioner's Office is.... **READ OUT. SINGLE CODE**

- A lot better.....1
- A little better .....2
- About the same.....3
- A little worse.....4
- A lot worse .....5
- DO NOT READ**
- Not applicable worked with them less than a year .....6
- Don't know .....7

Q14b. Why do you say that? **PROBE:** Anything else? **WRITE IN VERBATIM COMMENTS IN FULL.**



**ASK ALL**

Q15. And how would you compare the quality of service provided by the Information Commissioner’s Office with that of other organisations you have dealt with generally. Would you say their service is.... **READ OUT. SINGLE CODE**

- A lot better.....1
- A little better .....2
- About the same.....3
- A little worse.....4
- A lot worse .....5
- DO NOT READ**
- Refused.....6
- Don’t know .....7

**Reputation**

Q16a. What would you say are the main strengths of the Information Commissioner’s Office as an organisation? **WRITE VERBATIM RESPONSE IN FULL.**

Q16b. What would you say are the main weaknesses of the Information Commissioner’s Office as an organisation? **WRITE VERBATIM RESPONSE IN FULL.**

Q16c. Finally, what would you see as the main issues to address in terms of improving the relationship between your two organisations? **PROBE:** Is there anything else? **WRITE VERBATIM REPONSE IN FULL.**



**THANK AND CLOSE**

That's the end of the interview. Thank you for your assistance. Before we close, can we just check whether you would be happy for your comments to be passed on to the Information Commissioner's Office in an attributable form...

Yes I would be happy .....1  
No, I would rather not .....2

I would just like to confirm that my name is.....and I have been calling on behalf of Jigsaw Research in London, and that all your responses will be kept completely anonymous and confidential. Should you wish to verify this information in anyway I can provide you with either the name and telephone number of the executive in charge of this project or alternatively you can call Freephone Market Research Society on 0500 396999 who will be able to confirm our status as a legitimate market research agency.



**IF REQUIRES EXECUTIVE NAME AND NUMBER**

Sarah McKee 0207 291 0830