

# Corporate Plan 2007 - 2010

What and how? Our strategy over the next three years





## ICO achievements – 2006

- We have substantially improved the way we handle freedom of information complaints and are now producing a steady stream of well-respected results.
- The importance and profile of data protection have never been higher – we have put surveillance issues and the illegal trade in personal information on the map.
- Our Customer Service and Casework and Advice teams have achieved dramatic improvements in response times and service standards for both data protection and freedom of information work.

We have scored impressive and well-publicised results with data protection and Privacy and Electronic Communications Regulations enforcement activity.

- We have a new website, a new intranet and a much more professional approach to communications.
- We have hosted two major international conferences which established our position of global leadership for freedom of information and privacy.
- We are transforming our approach to human resources.
- Our regional offices are well- established and respected locally, as well as being part of the ICO as a whole.



## Commissioner's foreword



**'This Plan serves as our route-map – where we plan to go over the three years from April 2007, and how we intend to get there. It provides the direction for more detailed plans and decisions.'**

We have modernised and achieved a lot in recent years and our profile has never been higher. But, as the first decade of the 21st century draws to a close, the ICO enters a tough – but rewarding – phase. Information rights are increasingly important, with the public demanding more transparency from public bodies while at the same time wanting more personal privacy. Every organisation seeks public trust and confidence, but not all readily associate those goals with handling information well. From banks not keeping personal information safe, to concerns about ID cards and electronic health records, data protection is becoming as politicised as freedom of information. And for the public sector, the pressures to perform more efficiently with reduced resources will be immense and will impact on information handling. So, the demands on the ICO will increase. Hard choices, based on clear priorities, are unavoidable, especially as the ICO faces the same resource pressures as other public bodies. We have had to shelve plans to expand our accommodation in Wilmslow, leaving us pushed for space, and we will be doing more focused staff training this year.

The ICO is a small, but complex, organisation which, to ensure it meets the challenges it faces, needs to continue with wide-ranging transformation and improvement. We have already come a long way – stronger leadership and management, better governance, improved business planning, a much sharper focus on achieving defined results, and improved communications.

We have transformed our approach to data protection – a functional structure, a clear commitment to practical approaches, and a targeted, risk-based approach to enforcement. Much remains to be done, however – spelling out the benefits of data protection in terms of privacy and continuing to push for simplification and myth-busting. As public and private sectors assemble ever more information about people, and seek to share it across traditional boundaries, we must, in measured and responsible ways, be vigilant to ensure the proper protection of personal information.

Freedom of information continues to present big challenges but our 2006 progress report documented lessons learned, changes made, and evidenced a track record of achievement which continues with a regular flow of decisions of complexity, controversy and variety. The problems – largely now from higher than predicted volumes – have not disappeared, but we are much better equipped to address them. However, given the urgency of clearing the backlog of freedom of information complaints, we will have to focus our resources to ensure we maintain and achieve satisfactory customer service for complaints casework.

We are aware that life will not be easy over the next three years:

- We have been unable to secure additional resources for freedom of information work, with our grant-in-aid reduced to just £4.7 million a year. Although our data protection income is likely to remain sufficient, it cannot be used to fund freedom of information work.
- Until freedom of information complaint volumes stabilise and backlogs are eliminated, we will need to divert resources into casework and away from other necessary freedom of information work such as:
  - promoting good practice;
  - research; and
  - undertaking customer satisfaction surveys.
- The ICO faces big intellectual and practical challenges from new technology, globalisation, and competing public policies, as we try to restrain the development of the 'surveillance society'.
- The process of modernising the ICO must continue with further changes that will not always be comfortable.
- The ICO's package of pay and benefits must enable us to recruit and retain staff with the levels of skill, experience and commitment that our role demands.

We are stretched, but we are aware of the importance of our role. We have a healthy and strong appetite to make a difference. Fulfilling this Plan – with tangible, worthwhile outcomes – will enhance our standing as a well-run, well-respected and successful organisation.

A handwritten signature in blue ink that reads "Richard Thomas". The signature is written in a cursive, slightly slanted style with some horizontal lines above and below the name.

**Richard Thomas**

April 2007

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# 1. Outcomes, functions and priorities



**Our mission statement**  
Promoting public access to  
official information and protecting  
your personal information

## What are we seeking to achieve?

Our overall approach must be focused on the outcomes for which we exist:

- getting official information into the open unless there are good reasons for non-disclosure; and
- ensuring that personal information is properly protected.

This Plan gives measurable outcomes of our performance where this is meaningful – and we continue to develop further indicators of our performance. However, not everything we do can and should be measured. As a strategic regulator, we will often be at our most effective when influencing the behaviour of organisations to secure good practice – the outcome which lies at the heart of our responsibilities.

Compliance with the law is not a goal in itself. The benefits of freedom of information and data protection can and should be achieved without the ICO's constant intervention. Seeking to minimise compliance costs and complexity, we should encourage organisations to strive for good practice as a matter of self-interest. But – with a risk-based and targeted approach to enforcement – we need to be tough on those who deliberately or persistently fail to deliver the benefits intended by the law.

Strategic regulation means making the best use of all our different types of function, separately and in combination.

## Three types of function

**Educating and influencing** Promoting good practice, rights and obligations  
Making it as easy as possible for organisations to know how they should behave  
Targeting our efforts where we can secure the greatest impact

**Resolving problems** Providing effective solutions and remedies for justified complaints  
Prioritising robustly so as to concentrate on cases of substance  
Learning from cases, especially those highlighting wider problems  
Aiming, where possible, to achieve results by co-operation in preference to compulsion

**Enforcing** Using legal sanctions against those who ignore or refuse to accept their obligations  
Adopting a firm but fair approach  
Targeting our efforts where risks from non-compliance are greatest  
Prepared to take measured risks of our own when taking enforcement action

## Our top priorities over the next three years

Three priorities will continue to provide a reference point for everything we do across the ICO:

- **Succeeding with our freedom of information responsibilities – deciding cases in ways which command public and organisational confidence and which promote a genuine ‘open government’ culture.**
- **Strengthening public confidence in data protection by taking a practical, down-to-earth approach – making it easier for the majority of organisations who seek to handle personal information well, and tougher for the minority who do not.**
- **Ensuring we are well-led and well-managed: an effective, efficient and influential organisation, of which we are all proud – outward-looking and delivering real service to society.**

A number of specific initiatives or activities will command priority treatment over the next three years.

## From April 2007

- Continued priority for improving turnaround times for freedom of information and environmental information regulation casework, whilst maintaining the quality and consistency of our decisions.
- Review freedom of information casework levels, taking into account any changes to the fees regime, to ensure the optimum match between resources and capacity.
- Find more efficient ways of promoting freedom of information good practice when resources are being focused on improving casework handling.
- Encourage proactive disclosure of official information by working with public authorities to improve their publication schemes.
- Deliver and communicate real data protection benefits with targeted programmes of guidance, risk-based enforcement and policy proposals that inspire confidence.
- Continue to improve ICO's organisational and individual performance, effectiveness and efficiency.
- Continue our improvements in internal communications and staff involvement.
- Successfully complete our IT re-procurement, enabling us to make better use of IT systems.

## From April 2008

- Demonstrate that the ICO is seen as the most effective freedom of information and privacy regulator in the world.
- Consider closer integration and harmonisation of freedom of information and data protection casework.
- Ensure that, as an office, the ICO has the resources and the capacity to handle additional data protection work arising from national initiatives such as ID cards, electronic NHS records and information sharing.
- Restore programmes to promote freedom of information good practice by public authorities and improve the public's understanding of their rights.
- Based on the ICO's first three years' experience of regulating the Freedom of Information Act, identify possible improvements to freedom of information and environmental information legislation.

## From April 2009

- Implement plans for dealing with the expected increased demands arising from national initiatives such as ID cards, electronic NHS records and information sharing.
- Demonstrate that the 'surveillance society' is under better control, with privacy concerns routinely recognised and addressed across public and private sectors, and individuals aware of their rights and confident in using them.
- Demonstrate that public-sector culture has changed sufficiently so that open government is now widely seen as normal and natural.

## 2. Aims and objectives



**Our core functions translate into the following aims and objectives. These broadly match our organisational structure so that there are clear lines of responsibility for individual aims and objectives.**

## Aim 1 (Freedom of Information)

### Decide cases robustly, responsibly and efficiently where there is a dispute about access to information held by a public body

**Objective 1:** Make the most efficient use of available resources to clear casework backlogs and meet the service standards set out below:

	Estimated number of complaints received	Age of cases at closure			
		30 days or less	90 days or less	180 days or less	365 days or less
2007/08	Carry forward from 2006/07 1,250 cases  New cases received 2,400-2,500	50%	60%	65%	80%

The service standards reflect anticipated performance over the year as a whole and relate to all cases that we close, including those in the backlog. They are based on projections in the October 2006 Progress Report, which assumed that no additional funding would be available to meet increased demand, but have been adjusted to reflect the internal transfer of resources from other areas of freedom of information work.

Service standards are only set for 2007/08. This is because of potential changes to the regime for fees and charges, which would affect both the number of cases received and their nature.

**Objective 2:** Produce consistent and widely-respected freedom of information outcomes, and develop new criteria to ensure that the quality and consistency of casework meets acceptable levels.

**Objective 3:** Adopt a structured programme for early intervention, prioritisation and profile for high-impact and other precedent-setting cases.

## Aim 2 (Freedom of Information)

**Promote open government to bring about a culture where public bodies make as much official and environmental information available as possible, with citizens widely aware of their 'right to know'**

**Objective 1:** Fulfil a structured programme to promote good practice by public authorities, through information and guidance for public bodies and individuals which draws particularly on ICO and tribunal casework.

**Objective 2:** Make better use of publication schemes through a targeted programme, starting in 2007, which will draw on revised approval criteria for use where new schemes are needed.

**Objective 3:** Deliver the freedom of information Enforcement Strategy, with particular focus on recalcitrant public authorities.

## Aim 3 (Data Protection)

### Promote good practice by organisations that handle personal information

**Objective 1:** Implement outcome-focused programmes to take the lead in simplifying data protection and promoting good practice, through proactive encouragement and clear and unequivocal guidance. Initiatives will be targeted on defined audiences and areas of greatest data protection risk, so that organisations have confidence about what they need to do and citizens understand their rights.

**Objective 2:** Issue and negotiate Codes of Practice with the aim of making it as easy as possible for organisations to achieve high standards of data protection practice.

**Objective 3:** Encourage organisations to contact us – without fear of sanction – when they need help with compliance and good practice.

**Objective 4:** Play a leading role in policy debates on selected issues, nationally and internationally, where we can make a difference – with particular emphasis on information sharing, identity management and the risks of a 'surveillance society'.

**Objective 5:** Promote and support policies, procedures and legislative changes which give due weight to protecting the privacy of personal information, and improve the effectiveness of data protection in practice.

**Objective 6:** Actively engage with international stakeholders, with the aim of promoting more common ground amongst differing approaches to the regulation of data protection and privacy, and improving international communications and effectiveness.

## Aim 4 (Data Protection)

### Run an efficient and helpful Notification service

**Objective 1:** To increase the numbers of data controllers notified by at least 2% each year. This rise is to be achieved by reminding data controllers to re-notify, by targeting under-notified sectors, and by encouraging the use of direct debits.

**Objective 2:** Handle at least 35,000 new notifications, 255,000 renewals and 60,000 changes to notifications each year.

Dealing with new notifications and renewals within seven calendar days, and changes to existing notifications within 14 calendar days.

**Objective 3:** Handle at least 65,000 telephone call and 200,000 written enquiries relating to notifications each year. Answer 95% of calls with an average waiting time of less than 45 seconds.

**Objective 4:** To continue to increase the percentage of electronic transactions beyond the current total (50%). To review the current notification technology and develop our online processes with the aim of making a fully integrated online notification and payment service available by the end of 2008 for those who choose to use it.

## Aim 5 (Data Protection)

### Provide an efficient and valued Casework and Advice service

**Objective 1:** Operate an ICO Customer Service Team that:

- provides a national telephone helpline service to organisations and individuals asking about their responsibilities and rights – anticipating at least 100,000 calls each year, with the aim of answering over 95% of calls with an average waiting time of less than 45 seconds; and
- provides a case reception service processing 100% of complaints and enquiries (both freedom of information and data protection) within 14 calendar days of receipt.

**Objective 2:** Resolve written data protection and Privacy and Electronic Communications Regulations enquiries and complaints within the following timescales:

	Estimated number of complaints and written enquiries	Age of cases at closure		
		30 days or less	90 days or less	180 days or less
2007/08	21,000 – 23,000	45%	93%	99%
2008/09	21,000 – 23,000	50%	95%	99%
2009/10	21,000 – 23,000	50%	95%	99%

The above figures reflect a commitment to quickly filter out those complaints where:

- there does not appear to be any legitimate grievance about the handling of personal information which raises an issue of substance; or
- there does not appear to be any effective action we can or should take.

## Aim 6 (Data Protection)

**Take purposeful, risk-based regulatory action where obligations are ignored, examples need to be set or issues need to be clarified**

**Objective 1:** Selectively initiate, support or take on cases requiring formal regulatory action.

**Objective 2:** Ensure that procedures and practices for prioritising and targeting cases deliver the stated Aim as amplified through our Regulatory Action Strategy.

**Objective 3:** Ensure that all our regulatory action work:

- reinforces and dovetails with our other data protection activities;
- adopts a robust approach, as an office willing to take managed risks; and
- complies with standards of good regulatory practice, and in particular with the Better Regulation Principles.

### 3. Leadership and management



The ICO is small, but complex. We have grown and changed substantially in recent years, absorbing new functions and many new people. Our staff are keen to be better involved, with an appetite for worthwhile and well-managed change.

A high priority is to continue to improve the quality of our senior leadership and management, ensuring the ICO is well led and managed and makes the most effective and efficient use of our human, financial and organisational resources.

## **Commitment 1 – An effective ICO**

### **(a) Senior Leadership**

We will continue to implement our Leadership Development Programme which aims to ensure that all senior managers are committed to, and have the skills to:

- make a difference where it matters
- communicate effectively
- value and support our staff
- improve continuously
- take pride in everything we do.

### **(b) Business Planning**

We will ensure that our annual Business Plans:

- clearly link with this Corporate Plan and the annual budget
- contain challenging, but realistic, targets for each business unit
- better integrate the contribution of separate teams
- are sufficiently flexible to accommodate emerging demands
- are carried forward into personal objectives for each year
- are monitored regularly.

### **(c) Performance Management**

We will capitalise upon, and improve further, the progress which has been made since 2004 on:

- target setting and monitoring
- tackling poor personal and team performance
- documentation of policies and procedures
- quality control
- service standards
- customer satisfaction
- risk management.

### **(d) Information Services**

We will implement our IS strategy to:

- ensure the 2007 IT re-procurement fulfils its potential
- provide ICO staff with a solid IT platform and core applications that meet the needs of the ICO
- continually improve our ability to provide services to our stakeholders – including how best to provide an efficient and modern Notification process
- meet these needs cost-effectively.

### **(e) Regional Offices**

Regional Offices should serve the needs of their local communities, recognising the differences across the UK, whilst remaining fully integrated within the main work of the ICO as a whole.

### **(f) Monitor and evaluate**

We will continue our programme of surveys to better understand the needs and views of the public, our stakeholders, customers and staff, and to measure the results of our leadership, management and performance improvements.

## Commitment 2 – Ensuring that ICO people matter

### (a) Pay and reward

We will give high priority to pay and reward issues, aiming to provide our staff with the package of pay and benefits which is right for the job.

### (b) Modernising Human Resources

We will continue to implement our new Human Resources Strategy – particularly through further HR policies and procedures. The strategy focuses on helping everyone to get the best out of themselves and each other through:

- training;
- good quality work;
- job satisfaction;
- recognition;
- personal development;
- diversity; and
- fair treatment.

## **Commitment 3 – An influential ICO**

### **(a) Measuring the success of our communications**

In line with our Communications and External Relations Strategy, we will measure the effectiveness of our communications and publish the key indicators.

### **(b) Reaching and responding**

We will fill the gaps in our publication and information programme, ensuring we offer the right levels of information to meet the needs of our varied customers.

We will engage with key stakeholders, information rights practitioners and consumers, listening to feedback and responding with targeted information.

We will continue to develop our website and electronic communications, taking advantage of new developments where they help our customers to get the information and advice they need.

We will explore the needs of young people and hard-to-reach audiences to help them understand and exercise their information rights.

### **(c) Developing a culture of communications**

We will continue to develop internal communications by providing and improving communication channels, and by encouraging the greater involvement of staff.

We will continue to build a communications culture in the ICO, offering relevant training to staff, developing the role of managers, and ensuring ICO values are an intrinsic part of how we work.

### **(d) Influencing policy and practice**

Working with stakeholders, we will adopt a strategic approach to developing policy and guidance and communicating our key messages.

## Commitment 4 – An efficient ICO

### (a) Financial Management and Internal Controls

We will ensure that we meet all the obligations for the proper and efficient use of public money in accordance with the law, audit requirements and the ICO/DCA Framework Document.

We will develop firm proposals for unit costing to be used as an efficiency driver for casework with effect from April 2008.

We will continue to ensure that we make the most efficient use of all ICO accommodation and will develop an accommodation strategy that sets out the ICO's long-term aims.

### (b) Data Protection funding

Aiming to increase the number of organisations notifying the Commissioner by 2% each year, we anticipate data protection fee income as follows:

2007/08	2008/09	2009/10
£10.4 million	£10.6 million	£10.8 million

### (c) Freedom of Information funding

Our assumptions are based on grant aid for freedom of information as follows:

2007/08	2008/09	2009/10
£4.7 million	£4.7 million	£4.7 million

For both data protection and freedom of information work we will need to ensure that the ICO has the resources and capacity to deal with any increases in workloads, taking account of efficiencies the office makes.

Notes:

## Publications Line

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## Helpline

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If you have access to free or cheap calls to 'national rate' numbers, you may prefer to contact our helpline on 01625 545745.

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