

Information Commissioner's Office's Business Plan for 2009/10



Information Commissioner's Office
Promoting public access to official information
and protecting your personal information

Introduction

This Business Plan brings together the Information Commissioner's Office's (ICO's) main outputs, projects, tasks and improvements from April 2009 to March 2010. The Business Plan directly supports the ICO's Corporate Plan for 2009 – 2012 (available from the ICO's website).

The detail in the plan reflects the amount and range of work being done across the ICO, and the changes and challenges we face during the year.

In particular we face a rising freedom of information caseload during a period of tight public finances. Over the next few years it is unlikely that funding for our freedom of information work will increase, but we are committed to working more efficiently and effectively in order to meet the casework challenge. To an extent, performance will depend on the number of complaints we receive. While this is not in our control, we have based our plans and customer service standards on forecasts we think realistic given data on past complaints and our performance.

We expect to receive increased data protection powers when the Coroners and Justice Bill, which is currently going through Parliament, receives Royal Assent. To help fund our effective use of these powers, the current flat rate notification fee of £35 (which pays for our data protection work) is expected to become a tiered fee; we plan to increase our income to £16m per year from a higher charge for larger organisations.

Implementing a tiered notification fee and developing our organisation to deliver new powers and penalties effectively will be a big job for the ICO. Organisational changes will be made once both the funding and the powers come on stream, which we hope will be during this financial year.

Our data protection work has a continuing high profile in the media and politically; privacy issues are high on the public agenda, and we are making greater use of our current enforcement powers.

There are other big changes planned as well:

- We are hoping to move our Wilmslow based staff into one building next year (2010). The move will need planning for during the year ahead.

- We have an extensive programme aimed at upgrading our current IT infrastructure in a way which will help us meet the increased demands on us to work more flexibly, quickly and accurately. Both the infrastructure and some of the software is being upgraded.
- We are looking at new ways of working, such as working from home and talent management, and
- We are developing a sustainability plan to reduce the ICO's impact on the environment.

These are just some of the big challenges facing the ICO during the year ahead. In the summer of 2009 we will welcome a new Commissioner, and new challenges will emerge during the year requiring us to be flexible in our approach. This plan gives us the framework for the year ahead which can be adapted as our environment changes.

About the plan

Part 1 provides summaries of what individual business units do, their main anticipated outputs and volumes, and a commentary which highlights assumptions and risks.

Part 2 details new and across ICO outputs and volumes linked directly to the four focuses of the Corporate Plan:

- Educating and influencing
- Resolving problems
- Enforcing
- Developing and improving

If there are any questions or comments about the Business Plan please do not hesitate to contact Peter Bloomfield.

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Part 2

Educating and influencing

[Aim 1](#) - To promote freedom of information and open government, to bring about a culture where public bodies make as much official and environmental information available as possible, proactively and progressively, with individuals widely aware of their right to know.

[Aim 2](#) - To promote good DPP by organisations when handling personal information, with individuals and organisations aware of their rights and obligations.

[Aim 3](#) - To serve the differing needs of communities.

Resolving problems

[Aim 1](#) - To provide an efficient and valued customer service that deals with all information rights complaints and enquiries.

[Aim 2](#) - To provide an efficient and valued freedom of information casework service, making decisions in disputes about access to information held by a public body in a robust, responsible and efficient way.

[Aim 3](#) - To provide an efficient and valued data protection casework service.

[Aim 4](#) - To run an efficient and helpful notification advice service.

[Aim 5](#) - To increase customer satisfaction (as measured by our customer satisfaction survey)

Enforcing

[Aim 1](#) - Take purposeful risk-based enforcement action where obligations are ignored, where codes or guidance are not followed, and where examples need to be set or issues clarified

[Aim 2](#) - To ensure organisations which handle personal information comply with their obligation to notify with us.

Developing and improving

[Aim 1](#) - To achieve a clear, articulated and lived culture with a recognisable ICO feel that reflects our values and positioning.

[Aim 2](#) - To achieve recognisable world class performance through motivated staff who are committed to the ICO's goals and success.

[Aim 3](#) - To protect and promote the good reputation of the ICO.

[Aim 4](#) - To work as effectively and efficiently as possible, making best use of our resources and gaining value for money.

[Aim 5](#) - To improve our use of information technology to encourage efficiency, to keep pace with developments in society and to meet customer expectations

.1. Communications and External Relations department

Manager: Communications and External Relations Director: Susan Fox

Responsibilities

To promote and safeguard the good corporate reputation of the ICO and to raise awareness of information rights and obligations by:

- positioning the ICO as the UK's independent, influential and practical authority on information rights and responsibilities, making a difference to people;
- keeping staff well informed and providing opportunities for engagement;
- demonstrating the value of, and providing clear advice on, information rights and obligations;
- working with stakeholders and intermediaries; and
- helping to influence public debate on information rights issues.

Anticipated outputs and volumes

Media relations

- 1,300 press calls
- 100 news releases
- 130 statements
- 105 interviews
- 28 letters to editor
- 260 Daily media monitoring distribution to staff

Website

- 70-80 website updates per month; each update taking 5 to 45 minutes.

Publications etc

- 8 reprints
- 10 new publications (including DVDs, exhibition materials and leaflets)
- 4 campaigns
- 4 e-newsletters

Events

- 60 speaking engagements arranged
- 8 events (either 2 events organised and 6 supported, or 5 events organised and 3 supported, depending on whether responsibility for event organisation transfers to the department).
- 30 speeches/presentations written
- One event per regional office

Internal communications

- 12 Informer editions
- 4 ICONNECT sessions
- ICON updated daily (includes front page and corporate calendar)
- 1 main staff corporate event, plus smaller staff events and at least 2

- charity events
- 12 notice board displays

International communications

- Weekly contact with the international data protection communicators' network

Commentary

- C&ER expects to take over the organisation of conferences (currently done by DP Practice or Development), providing the business case to ET for a new post to help with the extra work is successful. Assessment of the workload impact is currently underway. Figures shown above for both scenarios.
- The impact of new powers (compliance audits, penalties and new notification fees) is unknown and volumes above do not include them.
- The style and preferences of the new Commissioner are likely to have a strong impact on communications work.
- Details of business as usual (such as seasonal news releases, general contract renewals etc) are not included in the main body of the business plan for the sake of brevity. However, they have been included where specifics are already known (eg annual events), where the projects are bigger than usual, or where they may involve significant input from other parts of the ICO.

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2. Corporate Support Unit

Manager: Peter Bloomfield

Responsibilities

- Provision of a private office for the Commissioner, deputies and Chief Operating Officer.
- Support for the governance of the ICO by:
 - providing secretariat for corporate governance groups
 - managing the business planning and risk management process
 - providing a focal point for internal audit
 - providing a focal point for the Ministry of Justice (MoJ).

Anticipated outputs and volumes

Provision of a private office service

- To provide effective private office support for senior managers.
- To support the new Commissioner, ensuring his needs are met.

Corporate Governance

- To review the terms of reference for the various corporate governance groups by December 2009.
- To support governance groups making sure agendas are agreed, papers collated, and minutes produced, to deadline.
- To ensure the risk register is updated on a quarterly basis.
- To support development of the Business and Corporate Plans for 2010 and beyond, with plans published by 1 April 2010
- To ensure internal audit reports are provided to deadline with managers able to input into reports in an informed way.
- To provide MoJ with accurate and timely information in support of Parliamentary Questions and other enquiries.

Commentary

The main uncertainty will be the arrival of a new Information Commissioner. We will need to provide Chris Graham with the administrative support he requires and also guide him through the corporate governance arrangements for the ICO. We also need to focus on the internal audit process as, from the 1 April 2009; we have a new internal audit provider; Grant Thornton.

The Corporate Support Unit manager is on secondment to Data Protection Practice until December 2009. This will reduce the unit's ability to be flexible and to take forward extra responsibilities as staffing will be down 16%.

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3. Finance and Facilities

Manager: Andrew Cryer

Responsibilities

To ensure the ICO meets all of its financial obligations for the proper and efficient use of public money in accordance with the law, ICO/Ministry of Justice Framework Document and general good practice.

To prepare annual accounts for audit by the National Audit Office.

To prepare and maintain a budget for the ICO, and monitor and advise on expenditure throughout the year, ensuring sufficient cash flow to fund financial commitments.

To secure, maintain and operate our accommodation sites efficiently, with respect to the environment and in accordance with legislation.

Anticipated outputs and volumes

- To aim to pay suppliers within 10 days wherever possible, and, if later than 30 days, to disclose such late payment in the annual accounts.
- To collect at least 50% of notification fee transactions electronically within 1 working day of processing by the notification department.
- To distribute 350,000 items of incoming mail and 200,000 items of outgoing mail annually
- To develop a 5 year sustainability plan for the ICO

Commentary

Accommodation search for permanent premises for ICO Regional Office in Edinburgh

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4. Human Resources

Manager: Vicky Best – HR Director

Responsibilities

- Ensure recruitment and selection processes are effective and comply with relevant legislation, strategies and best practice guidelines.
- Ensure training and development needs are appropriately identified, effectively met and evaluated.
- Ensure HR policies and procedures are effective, meet legal requirements and are applied consistently and appropriately across the organisation.
- Ensure that managers and staff are advised and supported effectively in all HR and staffing matters.
- To support culture change and organisational development, and to ensure that there is appropriate HR input in the strategic direction of the organisation.

Anticipated outputs and volumes

- Develop and deliver an agreed schedule of recruitment campaigns
- Ensure ad-hoc vacancies are filled quickly and effectively
- Provide training and development in line with Learning & Development (L&D) Strategy
- Co-ordinate completion of annual Performance Development Reviews (PDRs) including the moderation panel
- Implement pay increase in July pay run

Commentary

- PDRs must be completed and returned to HR by the agreed date
- L&D activity is dependant on sufficient budget and accommodation

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5. Information Services

Manager: Lesley Bett

Responsibilities

Comprising the Information Technology team (IT), Internal Compliance Team (ICT), and Electronic Documents and Records Management project team (EDRM):

- To develop and deliver the Information Services strategy and underpinning Information Technology strategy.
- To manage the IS Agreement with ICO's supplier; Carillion
- Provision of the interface between Carillion and users ensuring business requirements are met (service delivery)
- Identification, management and delivery of changes to the IT infrastructure and changes to (or replacement of) current applications
- Procurement of outsourced IS services
- To ensure ICO is compliant with the requirements of the legislation it regulates including responding to requests for information
- Development and delivery of ICO's security policies relating to information, the physical environment, human resources and IT
- Records management, including the delivery of an EDRM solution for non-casework records and documents

Anticipated outputs and volumes

Internal Compliance

- 350 information requests received and acknowledged within 2 working days with responses given within statutory timescales
- Checking 10% of completed information requests where information has been withheld
- Information requests reviewed at closure and disclosure log updated where appropriate
- One staff awareness message on internal compliance/security a week
- Annual review of ICO's register entry
- At least 4 Security Committee meetings and 4 Internal Compliance Board meetings held and actions completed
- Bi-annual review of ICO's publication scheme
- Personal use monitoring (email and internet) completed and quarterly reports produced for managers
- A security audit of each regional office

Information Technology

- Complete annual Government Secure Intranet accreditation
- Complete annual IT disaster recovery and annual IT penetration tests
- Management of IS contract – target the Carillion service bonus to be applicable in at least 2 months
- Service review meetings with Carillion, ensuring actions are recorded

and completed

- Complete annual IS contract review
- Complete quarterly customer service surveys on adequacy of service and delivery, and act on findings
- 12 IT user group meetings
- Process Carillion staff security clearances within one day of receipt
- Deliver at least 1 IT security awareness message to users per week
- Provide technical support and security advice for emerging business requirements for online services.

EDRM Project Team

- Deliver at least 1 records management awareness message per month
- Hold at least 4 Local Records Officer Forums and complete actions

Commentary

Planning Assumptions

- In order to deliver the internal compliance work programme, that the 2 temporary posts in ICT are made permanent. The current temporary Band D contracts expire in August 09 and September 09.
- To complete the EDRM roll out, the temporary contracts of the project team are extended until the end of 09/10.
- To continue to embed records management into working practices, a dedicated records management function will need to be created
- Appointment of a project manager for the Duis replacement project
- Sufficient budget is available for the identified IT developments

Risks To Delivery

- Insufficient human resource or high staff turn-over
- Insufficient budget allocation to IT
- Higher number of information requests than expected halting other internal compliance work

Opportunities

- To embed the principles of good records management and information security into ICO working practices
- To complete the review and refresh of the IT infrastructure to meet changed and emerging business requirements
- The implementation of a new application to support changed Notification business requirements

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6. Frontline Operations

Manager: Paul Arnold

Responsibilities

Comprising the ICO's Customer Service and Operations Support Teams, Frontline Operations is responsible for:

- Providing the ICO's national telephone helpline service
- Developing and managing ICO customer contact channels
- Screening and prioritising all ICO casework correspondence
- Providing the ICO's Data Protection (DP) and Privacy and Electronic Communications (PECR) Case Reception Service
- Providing the ICO's Freedom of Information (Fol) and Environmental Information Regulations (EIR) Case Reception Service
- Supporting business units by providing a range of support services and through the development of effective Management Information (MI) and Business Intelligence solutions.

Anticipated outputs and volumes

Helpline

- 100-110,000 calls with over 90% answered and an average wait time below 1 minute

Customer Contact Channels

- New complaints and enquiries acknowledged within 3 working days

Case Screening and Prioritisation

- 45,000 submissions to the ICO screened, classified where necessary, and prioritised within 7 days of receipt.

Training and Quality

- Continue to develop the CST quality framework to ensure that quality and consistency are built in from the start of all CST casework processes, monitoring performance indicators to ensure output remains to the agreed standard.

DP Case Reception

Anticipating between 25,000 and 27,500 new referrals:

- Over 50% closed within 30 days of receipt.
- Over 70% closed within 60 days of receipt
- Remainder allocated to relevant department within 7 days of the need for referral being identified.

Fol Case Reception

Between 2,750 and 3,100 referrals and up to 1,000 enquiries:

- Over 50% of complaints closed within 30 days of receipt
- Over 80% of enquiries closed within 30 days of receipt
- Remainder sent to appropriate departments within 14 days of receipt

Operations Support

- Provision of MI reports for corporate governance groups.
- Provision of departmental MI and exception reports on a monthly basis

- Ad-hoc requests for readily retrievable MI provided within 7 calendar days.
- Decision Notice (DNs) sign off and FoI triage panel support. DNs to be allocated within 2 working days and sent on date of signing.
- FoI triage panel support to be provided within 2 working days of request.
- ICO business continuity plan reviewed, updated and tested annually
- FoI appeals logged and processed within 14 working days of receipt.
- To respond to requests for case review panels/senior case review panels within 1 week of request.

Commentary

Assumptions

- The profile of casework remains relatively constant; the proportion of cases suitable for early resolution does not alter significantly.
- That budget for overtime will be available during any period where referrals to the ICO exceed our monthly expectation or where the business unit is effectively operating below complement taking into account training/induction time for new staff.
- Technical support will be available from IS to assist with the development of MI solutions.

Risks

Short falls in the following areas will have an impact on performance:

- Sustained loss or significant reduction in IT performance,
- Delays in developing online solutions; specifically those relating to online customer journeys
- Significant ICO structural changes which involve Frontline Operations

Opportunities

We expect to be able to:

- Increase the level of experience within Front Line Operations areas and consequently: increase productivity, customer satisfaction and more generally take advantage of opportunities to continuously improve.
- Reduced reliance on overtime both in terms of budget and the impact on general working conditions.
- Develop dynamic and targeted MI and Business Intelligence solutions for the ICO.

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7. Casework and Advice Division

Manager: Faye Spencer

Responsibilities

- Investigating complaints about breaches of the Data Protection Act (DPA) and PECR, which are resulting in harm, require specialist sector specific expertise to resolve, require detailed investigation or relate to an organisation or business area we are particularly concerned about.
- Negotiating the resolution of cases where remedial action is required and where there is an opportunity to get the organisation to change so that it handles personal information properly.
- Using the complaints we receive to develop our understanding of topical DP issues, better understand public concerns and identify likely future developments where the ICO should 'get involved'.
- Using the complaints we receive to help educate a wider audience, not just the parties involved in the complaint.
- Liaising with Regulatory Action Division (RAD), identifying cases suitable for enforcement and organisations with the potential to benefit from audit.
- Liaising with Data Protection Practice (DPP), implementing defined policy lines and notifying them of current trends, complaint 'hot topics' and other matters of likely significance to the ICO.
- Representing the ICO (in particular casework related interests) at external meetings with stakeholders.

Anticipated outputs and volumes

We are expecting to receive between 5,000 and 7,500 cases over the year and to close;

- 33% within 180 days;
- 66% within 270 days; and
- 97% within 365 days.

Commentary

Assumptions

- The ICO receives 25,000 – 27,500 cases in 2009/10.
- The casework profile remains relatively constant and the proportion of work referred to CAD does not alter significantly.
- Overtime will be available where referrals to the ICO exceed expectation or where CAD is effectively operating below complement taking into account training/induction time for new staff.

Risks

- Failure to maintain adequate staffing levels.
- Significant reduction in IT performance.

- Further changes to the casework process. Following a period of significant change, CAD needs time to adjust to its new responsibilities.

Opportunities

CAD has the opportunity to:

- Assist the ICO to make better use of the complaints we receive, both in terms of casework analysis and forging closer links with business areas who are not traditionally involved with casework.
- Provide a better customer service in terms of the speed of our responses.
- Retain experienced staff, due to increased scope of, and variety in, job roles.
- Reduced reliance on overtime.

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8. Freedom of Information Complaints

Manager: Nicole Duncan

Responsibilities

Comprising the ICO's FoI and EIR casework teams based at Wilmslow, FoI Complaints is responsible for:

- Resolving complaints to the ICO under the FoI Act and EIRs.
- Leading development of ICO FoI and EIR complaints handling processes.
- Liaison with policy and enforcement teams to meet corporate aims.
- ICO wide representation on external complaints handling groups and at relevant external stakeholder meetings.
- Support for the delivery of a structured technical training programme for all FoI Complaints staff.

Anticipated outputs and volumes

Complaints Resolution

- Anticipated receiving 332 new complaints during the year plus cases carried forward.
- Expected to serve between 25 and 45 information notices.
- Anticipate closing approximately 450 cases during the year.

Triaging and Informal resolution

- That approximately 60%-70% of complaints received by FoI Complaints will be informally resolved.
- To report on informal resolution through production of relevant case synopses and feedback to GPE and Comms and ER.

Training and Quality

- Support for the delivery of the training for all FoI Complaints staff.
- Continue work on the FoI Complaints Quality Framework Project by completing the final phase of the project involving the development of casework guidance.

Commentary

- FoI Case Reception closes 50% of cases within 30 days of receipt. The remainder prepared and passed to Triage Casework Team which anticipates closing approx 1,000 cases (30%) within 60 days of receipt, submitting cases to the FoI Triage Panel within 30 days of receipt.
- Complaints allocated to FoI Complaints within 7 days following Senior Triage Panel feedback.
- Receipts remain within forecast and casework profile remains constant
- Staff receive necessary technical training and are fully effective in a maximum of 6-9 months from joining.

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9. Data Protection Development

Manager: Jonathan Bamford

Responsibilities

- Taking forward DP policy initiatives in priority areas such as on surveillance society, identity cards and e-borders
- Undertaking major pieces of DP policy work of a cross sectoral nature including our codes of practice on CCTV, privacy notices and information sharing and the privacy impact assessment handbook
- Commissioning and managing research projects and programmes furthering the ICO DP policy agenda such as on the surveillance society and privacy by design
- ICO international responsibilities including Article 29 Working Party, EU joint supervisory authorities, and International and European Commissioners' work programmes
- Promotion of DP as good business practice
- Maximising opportunities to influence key stakeholders including parliamentary liaison and providing evidence to parliamentary inquiries
- Scrutinising new legislation
- Analysing trends and monitoring developments in technology

Anticipated outputs and volumes

International Responsibilities:

- All plenary meetings attended (Art 29, Europol, CIS, Schengen, Eurodac, Eurojust, and Commissioners' conferences inc WPPJ), briefing notes drafted before meetings and reports produced within 5 working days (10 international conference). All sub group participation coordinated.

Stakeholder relations/promotion:

- 30 presentations in priority areas
- 100 meetings- including quarterly civil society and think tank liaison meetings
- 2,000 written/e-mail outbound contacts
- 1,000 phone calls
- 15 consultation responses all within deadline
- evidence to parliamentary committees both written and oral as required and by submission deadline

Policy Development Initiatives:

- DP Strategy Action plans- Surveillance Society, Public Security and Surveillance, Privacy by Design: All plans managed and updated for DP Strategy meetings (quarterly) and relevant work items undertaken (ongoing as per plans)

Commentary

Reductions in staffing and resources will create a risk to delivery of most elements.

It is assumed that the Coroners and Justice Bill will proceed to Royal Assent. If it does not then associated work items will not proceed.

Report on Surveillance may be dependant upon MoJ providing requested financial resources

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10. Data Protection Practice

Manager: Phil Jones

Responsibilities

DPP provides expert advice and guidance on the application of the DPA internally and across the private and public sectors. We

- advise on novel and/or complex issues
- produce clear and practical guidance
- drive the ISEB programme of accredited DP training
- develop and maintain good working relationships with stakeholders
- promote awareness and best practice through speaking at seminars and conferences, giving media interviews and briefing our press office
- use our influence to promote appreciation of the need for good DP practice
- work closely with international colleagues to ensure consistent application of existing EU law and to promote better appreciation of alternative approaches.

Anticipated outputs and volumes

Providing advice on novel and/or complex issues with expected monthly levels of:

- externally, 100 items written responses and 70 over the phone and in meetings
- internally, 80 responses; immediately where possible but otherwise within 14 days

Guidance Programme

- publish an estimated 8 Good Practice and Technical Guidance Notes
- input into approximately 4 web user journeys as they are developed

ISEB Training

- run at least 2 courses p.a. (10-12 per course) with 100% pass rate

Stakeholder relations

- an estimated 200 regular meetings/conference calls with major handlers of personal data (quarterly meetings with cras, DWP, DCSF, ISA and others) and other meetings as necessary
- organise major annual Data Protection Officers Conference (250-300)

Promoting awareness

- speaking at appropriately 60 seminars and conferences
- approximately 100 media interviews and press office briefings

International liaison

- continue to take the major role in the development of Binding Corporate Agreements (BCRs) (achieving acceptance of 12 on which we lead) whilst leading review of approach
- attendance at the expected 8 Article 29 sub-group and other international meetings as required

Commentary

Given the greatly increased profile of DP, and pressing demands on existing resources, we will have to continue to review what we can cope with and will inevitably have to continue to severely limit the number of speaking engagements we undertake.

Despite efforts to anticipate, inevitably we have to be responsive, responding to internal needs (for expert advice and enforcement support) and external developments (government, business initiatives and international demands).

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11. Regulatory Action Division

Manager: Mick Gorrill

Responsibilities

- Undertaking non-criminal enforcement action, including information and enforcement notices and 'Stop Now' orders, where negotiation fails or is inappropriate
- Investigation of criminal offences under both the DPA and FoIA, with a view to prosecution
- Auditing of the achievement of good DP practice
- Spot check audits of Government Departments
- Meeting the Commissioner's obligation in relation to international supervisory arrangements
- Planning, preparing and considering the use of external consultants to assist in our audit function

Anticipated outputs and volumes

Resolution of cases sent to the Enforcement Unit:

- for non-criminal enforcement.
 - Expected: 50 with 75% of cases actioned within 3 months.
- where a penalty fine has been recommended.
 - Expected: 15 with 50% of cases forwarded to RAD Legal for consideration of the issuance of a letter informing them that the Commissioner is minded to issue a penalty notice.

Investigation of non-notification cases with a view to prosecution.

- Expected 75 with 75% completed within 3 months

Investigation of Section 55 DPA and Section 77 FoIA cases with a view to prosecution, caution or undertaking.

- Expected 75 (DPA: 65 – FoIA S77: 10)
- 75% of investigations completed within 9 months.

Review and make recommendations for the issuance of a penalty fine for serious breaches of the DP principles.

- Expected 7.
- 75% issued

Review and make recommendations for prosecution or otherwise of S55 cases referred to the RAD Lawyers from Investigations.

- Expected 25.
- 80% reviewed and recommendations made within 14 days.

Prepare procedure for issuing penalty fines for CAD and RAD staff.

- Procedure completed by September 2009.

Review and make recommendations for prosecution or otherwise of non-notification cases forwarded to RAD Lawyers by Investigations.

- Expected 40
- 80% reviewed and recommendations made within 14 days.

Preparation and conclusion of cases for Information Tribunal referred by Enforcement.

- Expected 5.
- 80% of cases concluded within 15 weeks.

Facilitate the Hampton Review of the ICO.

Compliance audits of data controllers.

- Expected 12
- Adequacy within 4 weeks.
- Compliance report within 6 weeks.

Development of second audit group –depending on resources

Development of audit system and methodology to support increased volumes of compliance audits.

Commentary

Future powers to audit without consent awaited along with ability to issue monetary penalties for serious breaches of the DPA.

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12. Notification

Manager: Traci Shirley

Responsibilities

Maintain the number of organisations notifying with us under the DPA by:

- running an efficient and valued advice service for businesses and public bodies.
- processing new notifications, fees and amendments to existing notifications.
- directly contacting those organisations from under notified sectors and large organisations, informing them of the notification requirements.

Anticipated outputs and volumes

- 40,000 new notifications received and processed within five working days of receipt date.
- 262,000 renewal fees received and processed within five working days of receipt.
- At least 60,000 changes to register entries, with each amendment completed within 10 working days of receipt
- 15,000 written queries within 5 working days of receipt.
- 60,000 telephone enquiries relating to notification, aiming to answer 92% with an average wait time of less than 45 seconds.
- At least 5,000 letters to organisations that have not notified informing them of the legal obligations regarding notification.
- Implement revised data protection fees regulations during October.
- Alongside IS, work on a project to replace Duis with a new notification system with on-line capabilities and modernising how organisations notify and maintain their registrations, by 2010/11.

Commentary

Revised data protection fees will require additional resources to cover the work of experienced notification staff working on the interim tiered fee project.

The new notification system will also require additional resources to allow experienced notification staff to work potentially full time on this project.

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13. FoI Good Practice and Enforcement

Manager: Gerrard Tracey

Responsibilities

- Ensuring public authorities and citizens are aware of the access rights and obligations provided by the FoIA and the EIR.
- Promoting proactive disclosure and improving the performance of public authorities in relation to request handling.
- Taking appropriate enforcement action.
- Maintaining and improving existing relationships and developing new relationships with relevant stakeholders.
- Producing clear guidance which reflects Tribunal decisions and policy development, to meet public authority and citizen expectations.
- Providing written and verbal advice and guidance to public authorities and citizens in relation to the FoIA and the EIR.

Anticipated outputs and volumes

- Production of at least 12 pieces of FoIA and EIR guidance
- Increased stakeholder liaison, including 100 targeted engagements and 5 regional surgeries, to communicate key messages and identify trends and issues
- Respond to enquiries within 15 working days
- 100 structured/regulatory interventions by enforcement
- To run fortnightly FoI surgeries to provide advice for the Internal Compliance Team to assist in their handling of FoI requests.

Commentary

There is a clear risk that should funding not be the same as 2008/09 there will be a negative impact on the planned outcomes. This could lead to reputational risk to ICO, for example, if we are unable to implement the new GPE Monitoring Strategy.

There is an opportunity in the coming year to consider the citizens' needs, as opposed to focussing on public authorities, in relation to targeted guidance and advice about FoI.

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14. Freedom of Information Policy

Manager: Steve Wood

Responsibilities

- Reviewing FoIA and EIR DNs for quality and consistency
- Formally signing FoIA and EIR DNs
- Drafting lines to take, and policy papers
- Drafting briefing notes on all Tribunal and Higher Court decisions
- Maintaining the FoI policy knowledgebase
- Responding to policy advice requests from case officers and GPE
- Sourcing external research to support FoI policy objectives
- Responding to external consultations relevant to FoI policy
- Management of FoIA and EIR appeals made to the Tribunal and Higher Courts
- Enforcement of non compliance with DNs, information notices and enforcement notices

Anticipated outputs and volumes

- 300 DNs reviewed and 130 signed
- 50 lines to take (including s.37, updates to s.35 based on UCL report)
- Trial of pilot system for categorising and searching for ICO decisions by topic, subject or issue
- 100 Tribunal and Higher Court summary notes
- 30 formal policy advice requests responded to
- 10 requests for legal advice
- Hold an estimated 25 case review panels
- Responses to 12 GPE scoping documents
- Regular policy update internal newsletter (review after 6 months)
- 100 appeals to the Information Tribunal as respondent
- 5 appeals to the Higher Courts as respondent
- 70% of replies to Information Tribunal Appeals to be drafted in house by FoI Policy Solicitors.
- 70% of submissions for hearings heard on the papers to be drafted in house by FoI Policy solicitors.
- Develop a precedent bank system to support legal drafting for Information Tribunal replies and submissions.

Commentary

Many of the volumes above are driven by the number of DN's issued, a matter that is not within the control of the team or the ICO. It is driven by the nature and volume of section 50 complaints received, and the appeal rate of our decisions.

Work on lines to take and policy priorities will depend on the balance required between reactive policy work on High Court and Tribunal decisions and proactive work on new policy areas (e.g. 37). These priorities often change throughout the year as issues that arise from appeals can fluctuate in importance. Section 29 (the economy) may yet turn into a policy priority depending on evidence coming from the FoI complaints triage process. This will also be dependent on resource available within the team.

Assuming responsibility for managing the FoI training programme is based upon an assumption that an extra member of staff will be seconded into the policy team to free up enough resource to enable this role to be developed within the team.

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15. Northern Ireland Regional Office

Aubrey McCrory

Responsibilities

- Fostering awareness of information rights and ICO guidance.
- Researching local priorities and influencing policy making within Northern Ireland.
- Identify and input regional policy issues to Wilmslow and to contribute to the formulation of guidance; raising awareness of regional policy issues, local sensitivities and needs
- Providing a local enquiry and advice service for organisations and individuals.
- Undertaking FoI and EIR casework relating to public authorities based in NI and GB.
- Identifying opportunities for and supporting local enforcement action.
- Assisting the implementation of ICO statutory equality duties.

Anticipated outputs and volumes

- Responding to region specific post, e mail and telephone enquiries (FoI, EIR and DP) received by or referred to NIRO – 750 per annum
- FoI and EIR Casework – 180 cases closed (NI and GB)
- 50 meetings, 24 external speaking engagements, 12 regional government initiatives & legislation, 4 data sharing assurance initiative, plus 2 regional conferences and 1 regional report launch.
- Identify and respond to approximately 4 FoI and 8 DP related regional government initiatives and legislation.
- Refer all compliance and breach issues to, and work with, GPE and RAD using local knowledge and resources as appropriate.

Commentary

- Development of call waiting time monitor.
- All enquiries logged on database.
- Further DPA awareness training for staff.
- Development of call transfer to CST Wilmslow
- Training up on new GB sectors.
- Deployment of Senior Case Triage on old cases.
- Increased capacity in NIRO to sign off draft DNs and final signatory availability.

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16. Scotland Regional Office

Manager: Ken Macdonald

Responsibilities

- Promotion of the ICO in Scotland through engagement with all stakeholders
- Identify and input regional policy issues to Wilmslow and to contribute to the formulation of guidance; raising awareness of regional policy issues, local sensitivities and needs
- Provision of local enquiries service
- Influencing policy development with public authorities and, in particular, the Scottish Government and the Scottish Parliament
- Assist with the inspection of Scottish Public Authorities by RAD.
- Liaison with the Office of the Scottish Information Commissioner

Anticipated outputs and volumes

- Raising awareness of DP rights and responsibilities through 50 seminars, conferences and other learning activities, with minimum of 10 directed at private sector stakeholders and 10 at voluntary sector stakeholders. To include an ICO-led conference.
- Identify and resolve generic stakeholder concerns through regular attendance at forums (expecting to attend at least 12)
- Develop privacy friendly policies and practices by working with stakeholders on an estimated 6 projects.
- Provide telephone and e-mail advice service for local stakeholders (1,200 calls per annum and 700 responses to e-mail enquiries)
- Refer approximately 6 breaches to, and work with, RAD, providing local information as necessary on cases referred by the Scotland office.
- Provide advice for Scottish stakeholders on the distinction between the FoIA and the FoI (Scotland) Act
- Prepare for second phase of office relocation including accommodation for new team, if necessary, with relocated by no later than June 2010.

Commentary

Key dependencies:

- Demand from stakeholders
- Scottish Govt / Scottish Parliament activity
- ICO expansion

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17. Wales Regional Office

Manager: Anne Jones

Responsibilities

- To develop ICO's presence within Wales by engaging with stakeholders, authorities, businesses and individuals and by fostering their awareness of the Acts
- Identify and input regional policy issues to Wilmslow and contribute to the formulation of guidance; raising awareness of regional policy issues, local sensitivities and needs
- To undertake Fol and EIR casework relating to public authorities based within Wales and the south-west of England
- To respond to Fol, DP and EIR enquiries
- To respond to the specific needs of Welsh-speaking citizens through implementation of the Welsh Language Scheme

Anticipated outputs and volumes

- External speaking engagements – 24 pa
- Meetings with key stakeholders and stakeholder groups – 30 pa
- Respond to local enquiries and requests for advice within ICO timescales and targets
- Monitor and respond appropriately to new Welsh legislation and initiatives as they are proposed (includes consultation responses) – ongoing
- In view of recent staff turnover in the Wales RO, arrange monthly team-building activities, in liaison with HR. To include one specific session on team-building itself – Spring 2009
- Strengthen compliance with the DPA and FoIA by horizon scanning and building local intelligence in order to identify issues and opportunities.

Fol-specific outputs:

- To close 115 cases during the year.
- Monitor Fol compliance levels of Welsh PAs and identify suitable targets for local enforcement action in liaison with GPE – ongoing

Commentary

- DP outputs assume that current DP vacancies are filled, and that new post-holders are trained in time to make an effective contribution to the plan
- Fol outputs assume maintenance of the current level of staffing
- Level of involvement with the Welsh Assembly is to some degree dependent on legislative and policy outputs from the Assembly

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Educating and influencing

Aim 1

To promote freedom of information and open government, to bring about a culture where public bodies make as much official and environmental information available as possible, proactively and progressively, with individuals widely aware of their right to know.

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Action 1.1

Deliver a renewed programme to promote good freedom of information practice among public authorities by providing targeted advice and guidance for sectors and individuals, drawing on ICO knowledge, casework and Information Tribunal decisions.

Anticipated outputs and volumes

E&I 1.1.1	Revise existing ICO guidance to reflect Information Tribunal decisions and new and revised lines to take.	FoI GPE FoI Complaints. FoI Policy. Regional offices. Comms and ER.
E&I 1.1.2	Identify the brands of FoI guidance and create designed templates.	Comms and ER. FoI GPE.
E&I 1.1.3	Identify communications improvements to help central and local government to do FoI requests better.	Comms and ER. FoI GPE.

Action 1.2		
In line with the key indicators in our Communications and External Relations strategy, maintain awareness of freedom of information rights and obligations by using media opportunities and events, and publicising decisions, enforcement activities and case studies; anticipate the information needs of our customers, with the emphasis on web content, web presence and trade and consumer media relations.		
Anticipated outputs and volumes		
E&I 1.2.1	Run a campaign to raise awareness of the most important obligations.	Comms and ER. Fol GPE.
E&I 1.2.2	Improve Fol instructional copy on our website and in publications, to help reduce the risk of receiving ineligible complaints.	Comms and ER. Fol GPE.
E&I 1.2.3	To jointly organise and coordinate Fol live.	Fol GPE. Fol Complaints. Fol Policy. Regional offices. Comms and ER.
E&I 1.2.4	Support and publicise the "International Right to Know" day 2009.	Comms and ER. Fol GPE. Fol Policy. Regional offices.
E&I 1.2.5	Develop a stronger relationship with the Welsh media and take advantage of any opportunities to raise the profile of Fol in Wales.	Wales RO. Comms and ER. Fol GPE.

<p>Action 1.3 Continue to encourage proactive disclosure by promoting publication schemes and monitoring their use.</p>		
<p>Anticipated outputs and volumes</p>		
<p>E&I 1.3.1</p>	<p>Monitor the adoption of publication schemes and the publishing of information in accordance with the schemes, aiming for a minimum of 20 public authorities a month.</p>	<p>FoI GPE. FoI Complaints. FoI Policy. Regional offices. Comms and ER.</p>
<p>E&I 1.3.2</p>	<p>Undertake research into publication scheme implementation in Northern Ireland with four sectoral research projects and ongoing references.</p>	<p>Northern Ireland RO. FoI Complaints. FoI GPE.</p>

Educating and influencing

Aim 2

To promote good DPP by organisations when handling personal information, with individuals and organisations aware of their rights and obligations.

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Action 2.1

Continue to simplify data protection by providing clear guidance, prioritised according to our Data Protection Strategy, and by targeting initiatives at defined audiences and areas of greatest data protection risk. Our aim is for organisations to be confident about what they need to do, and for individuals to understand their rights.

Anticipated outputs and volumes

E&I 2.1.1	To publish comprehensive generic guidance on the Data Protection Act by June 2009, adding further modules as appropriate.	DPP Comms and ER.
E&I 2.1.2	Promotion of data sharing assurance initiative with four organisations identified and given assurance.	Northern Ireland RO.
E&I 2.1.3	Privacy Notices code of practice to be published by April 2009	DPD. Comms and ER.
E&I 2.1.4	ICO code of practice on Privacy and Websites. Draft December 2009, consultation January 2010 and publication March 2010.	DPD. Comms and ER.
E&I 2.1.5	Statutory Code of Information Sharing, drafted Feb 2010 with external consultation March 2010.	DPD. Comms and ER.
E&I 2.1.6	Create new design templates for good practice notes.	Comms and ER. DPP.

Action 2.2		
Continue to encourage good Data Protection Practice, keeping pace with technological, social and legal changes and setting priorities in accordance with our Data Protection Strategy.		
Anticipated outputs and volumes		
E&I 2.2.1	Personal Information Promise: promise promoted and 1,000 further sectoral signatories secured by 28 January 2010.	DPD. Wales RO. Comms and ER
E&I 2.2.2	Research project into economics of proactive privacy protection: bid to PC in April 2009, contract selected June 2009 and final report November 2009.	DPD.
E&I 2.2.3	Privacy Incidents Lessons Learned: proposal to PC in April 2009, scoping work completed June 2009, contact selected October 2009 and go live March 2010 ¹ .	DPD.
E&I 2.2.4	Renew contact with Welsh FSBs and the Chambers of Commerce in order to raise awareness of DP and privacy related issues in the private sector – autumn 2009.	Wales RO.
E&I 2.2.5	Renew contact with the Welsh voluntary sector umbrella organisations in order to raise awareness of DP and privacy related issues in that sector by winter 2009.	Wales RO.

¹ PILL work depends on DP officer participation, this being gauged at DPO conference and the project will not proceed if insufficient participation anticipated.

Action 2.3		
Play a leading role in policy debates on privacy issues, nationally and internationally, where we can make a difference – with particular emphasis on information sharing, privacy by design, the security of personal information and data use in public security and surveillance.		
Anticipated outputs and volumes		
E&I 2.3.1	DP Strategy Action Plans, surveillance society, public security and surveillance, privacy by design: All plans managed and updated for quarterly strategy meetings and relevant work items undertaken (ongoing as per plans).	DPD.
E&I 2.3.2 ²	Report to Parliament on surveillance (in response to HAC report) commissioned and produced annually. Work scoped and delivery plan produced by October 2009; contract secured January 2010 with the final report delivered in June 2010.	DPD.
E&I 2.3.4	Promote the ICO view on policy issues with a privacy dimension to the Scottish Government, Parliament and CoSLA, by responding to formal consultations and by holding informal discussions with key officials and (where appropriate) with elected members. Expecting a minimum of 6 formal consultation responses.	Scotland RO.
E&I 2.3.5	The development (with key partners) of a Scottish Privacy Forum, to be established by October 2009.	Scotland RO.
E&I 2.3.6	Organise and support a DPO Conference.	Comms and ER. DPD.
E&I 2.3.7	Continuing input at all levels of the Welsh Assembly's "Making the Connections" initiative.	Wales RO.

² 2.3.3 removed as it duplicated 2.1.5

Action 2.4		
Promote and support policies, procedures and the legislative changes which improve the effectiveness of data protection in practice. In particular, during 2009/10 we will work with the government to introduce and implement legislation to increase our powers, sanctions and resources and to implement the recommendations of the independent Data Sharing Review. We will also continue our work on influencing debate on the future of the EU Data Protection Directive.		
Anticipated outputs and volumes		
E&I 2.4.1	To manage the ICO's response to the passage of the Coroners and Justice Bill as it progresses to Royal Assent in October 2009, including liaison with the MoJ.	DPD. Comms and ER.
E&I 2.4.2	Provide practical advice to colleagues pursuing legislative change and in practical implementation of new provisions for data sharing.	DPP.
E&I 2.4.3	Work with the Scottish Government on a strategy to undertake public sector spot-checks.	Scotland RO. RAD.
E&I 2.4.4	To prepare for potential expansion of Scotland RO activities in support of expanded powers, including, in particular, the incorporation of a regionally based audit team by Summer 2009.	Scotland RO.
E&I 2.4.5	Improving Directive Project – project managed and final report by May 2009.	DPD.

<p>Action 2.5 Engage with international colleagues to promote common ground amongst differing approaches to the regulation of data protection and privacy, and to improve communications and effectiveness in line with the London Initiative (an ICO-led agreement by international data protection and privacy commissioners to work together to share best practice).</p>		
<p>Anticipated outputs and volumes</p>		
<p>E&I 2.5.1</p>	<p>Contribute to Article 29 and other groups developing agreed approaches, in particular:</p> <ul style="list-style-type: none"> • the Spanish Initiative, exploring the feasibility of the development of international data protection standards; and • to make the major contribution to work on Binding Corporate Rules, designed to simplify DP compliance for international organisations, leading on 15 applications and securing acceptance of 3 or 4. <p>Attendance at Article 29 Working Group sub-group on children and privacy.</p>	<p>DPP.</p> <p>Scotland RO</p>
<p>E&I 2.5.2</p>	<p>Coordinating ICO participation in London Initiative and Galway Project.</p>	<p>DPD.</p>
<p>E&I 2.5.3</p>	<p>Edinburgh European Conference organised April 2009.</p>	<p>DPD. Scotland RO Comms and ER.</p>
<p>E&I 2.5.4</p>	<p>Develop the international data protection communicators' network.</p>	<p>Comms and ER DPD and DPP</p>

<p>Action 2.6 In line with the key indicators in our Communications and External Relations Strategy, maintain awareness of data protection rights and obligations by using media opportunities and events, and publicising decisions, enforcement activities and case studies; anticipating the information needs of our customers with the emphasis on web content, web presence and trade and consumer media relations.</p>		
<p>Anticipated outputs and volumes</p>		
E&I 2.6.1	DP Policy Issue Conference: topic agreed July 2009, venue secured August 2009, programme and speakers agreed September 2009 and conference held December 2009.	DPD. Comms and ER.
E&I 2.6.2	Run campaigns to raise awareness of most important obligations.	Comms and ER.
E&I 2.6.3	Agree activities internationally and support and publicise Worldwide DP week 2010.	Comms and ER. DPD and DPP
E&I 2.6.4	Develop a stronger relationship with Welsh media; taking advantage of opportunities to raise the profile of data protection and privacy issues.	Wales RO. Comms and ER.
E&I 2.6.5	Understand the most frequently asked data protection questions and provide the information via web, print and media relations.	Comms and ER. DPP. Frontline ops

**Educating and influencing
Aim 3**

To serve the differing needs of communities.

[Contents](#)

Action 3.1

Promote open government, good DPP and the role of the ICO throughout the UK, with our offices in Northern Ireland, Scotland and Wales serving the particular needs of those communities. They will provide information and advice on regional-specific issues, and work with devolved governments to input early into debates and ensure that data protection and freedom of information considerations are raised and taken into account.

Anticipated outputs and volumes

E&I 3.1.1	To undertake two research projects into local customer priorities.	Northern Ireland RO.
E&I 3.1.2	Provide advice to Wilmslow on specific issues relating to Wales and on best practice with regard to the Welsh language.	Wales RO.
E&I 3.1.3	Work with the Welsh Language Board to produce guidance on DP subject access requests and the Welsh language, by Winter 2009	Wales RO.
E&I 3.1.4	To prepare and implement a Scottish Awareness Raising Strategy by May 2009.	Scotland RO.

<p>Action 3.2 Refresh our implementation of our Stakeholder Strategy by the end of 2009/10, with the emphasis on coordinating contact with our top stakeholders and on working with intermediary or representative bodies.</p>		
<p>Anticipated outputs and volumes</p>		
E&I 3.2.1	Refresh our stakeholder strategy: improve database and public affairs intelligence, create an online toolkit for speakers, evaluate speaking engagements, target CEO level, and prepare for stakeholder perception survey in 2010/11.	Comms and ER
E&I 3.2.2	To organise a corporate conference in May 2009.	Comms and ER.
E&I 3.2.3	To prepare a regional Stakeholder Strategy by March 2010, based upon the ICO strategy but reflecting regional priorities.	Scotland RO. Wales RO. Comms and ER.
E&I 3.2.4	To develop and implement a regional communications plan, identifying regional priorities to be taken forward.	Northern Ireland RO. Comms and ER.

<p>Action 3.3 Continue to raise awareness of rights, in line with our Communications and External Relations Strategy, by supplying diverse, young and hard to reach audiences with information in the appropriate format, style and place; the emphasis to be on accessibility of materials, consumer media relations, web content and online presence.</p>		
<p>Anticipated outputs and volumes</p>		
E&I 3.3.1	Produce materials and projects to reach young people: repeat the Student Ambassador campaign; run a project on personal information and young people with Habbo Hotel; investigate web 2.0 and social networking for the ICO; develop the ICO young people's page and add a "latest news" section.	Comms and ER.
E&I 3.3.2	Select publications (as they are reprinted or created) for production in easy read format.	Comms and ER.

Resolving problems

Aim 1

To provide an efficient and valued customer service that deals with all information rights complaints and enquiries.

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Action 1.1

Provide a national telephone helpline service for organisations and individuals asking about their responsibilities and rights, anticipating 100,000 calls each year, aiming to answer over 90% of calls with an average waiting time for calls of less than one minute.

Anticipated outputs and volumes

RP 1.1.1	Answering over 90% of calls with an average waiting time of less than one minute.	CST.
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Action 1.2

Provide a case reception service acknowledging receipt of 100% of complaints and enquiries within three working days of receipt.

Anticipated outputs and volumes

RP 1.3.1	Acknowledge 100% of complaints and enquiries within 3 working days.	CST.
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Resolving problems

Aim 2

To provide an efficient and valued freedom of information casework service, making decisions in disputes about access to information held by a public body in a robust, responsible and efficient way.

[Contents](#)

Action 2.1

Make the most efficient use of resources to clear casework backlogs and to aim to close:

50% of cases within 30 days

60% of cases within 60 days

65% of cases within 180 days and

70% of cases within 365 days.

Anticipated outputs and volumes

RP 2.1.1	Customer Service Team to close 1,500 cases.	Front Line ops
	Fol Complaints Team to close 1,205 cases.	Fol Complaints
	Regional offices to close 295 cases.	Northern Ireland and Wales ROs.
RP 2.1.2	To review the DN sign off process to improve the efficiency and focus of the process, and to implement changes.	Fol Complaints Fol Policy
RP 2.1.3	To issue an anticipated 300 DNs	Fol Policy Fol Complaints

Action 2.2

Produce consistent and widely-respected freedom of information outcomes.

Anticipated outputs and volumes

RP 2.2.1	Review the Fol Policy knowledgebase to enable quality framework outputs to be accommodated on an interim basis and to develop proposals for an overall integrated Fol knowledgebase.	Fol Policy. Fol Complaints, CST and IS.
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Resolving problems

Aim 3

To provide an efficient and valued data protection casework service.

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Action 3.1

Resolve written DP and PECR enquiries and complaints within the timescales in the Corporate Plan and to aim to close:

50% of cases within 30 days

70% of cases within 90 days and

99% of cases within 180 days.

Anticipated outputs and volumes

RP 3.1.1	To provide advice immediately on referred cases wherever possible or within 14 calendar days if not (estimated on 200 cases pa).	DPP
RP 3.1.2	CAD to close between 5,000 and 7,500 cases.	CAD

Action 3.3

Ensure that all casework teams use their expertise to identify and deal with complaints that raise issues of substance and where we can make a difference.

Anticipated outputs and volumes

RP 3.3.1	Develop and implement a DP Casework Strategy setting out how we minimise DP risk when dealing with casework.	CAD. CST, RAD and DPP.
RP 3.3.2	Further explore ways in which we can use complaints received to identify trends, and better understand public concerns and our impact.	CAD.
RP 3.3.3	Follow policies and procedures to identify cases for referral to enforcement teams, with an estimated 50 cases per year being referred.	CAD Frontline Ops
RP 3.3.4	Development and maintenance of ICO business intelligence 'hub' by June 2009.	Frontline Ops

Resolving problems

Aim 4

To run an efficient and helpful notification advice service.

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Action 4.1

Handle at least 60,000 telephone and 15,000 written enquiries relating to notifications each year. Answer 92% of calls with an average waiting time of less than 45 seconds.

Anticipated outputs and volumes

RP 4.1.1	Handle at least 60,000 telephone and 15,000 written enquiries relating to notifications each year.	Notifications.
RP 4.1.2	Answer 92% of calls with an average waiting time of less than 45 seconds.	Notifications.

Resolving problems**Aim 5**

To increase customer satisfaction (as measured by our customer satisfaction survey)

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Action 5.1

Further improve the website, with navigation and content structure reorganised by the end of 2009/10 and a programme of continuous quality editing beginning in 2009.

Anticipated outputs and volumes

RP 5.1.1	Improve efficiency of project and contractor management.	Comms and ER. Finance
RP 5.1.2	Improve the document library so it is easier to navigate and find information.	Comms and ER.
RP 5.1.3	Make online enquiry form improvements.	Comms and ER. CST.
RP 5.1.4	Recruit and develop new online content editor.	Comms and ER.
RP 5.1.5	Upgrade content management software.	Comms and ER. IS.
RP 5.1.6	Complete reprourement of web contractor.	Comms and ER. Finance and IS.
RP 5.1.7	Investigate WAP and pod casting.	Comms and ER.
RP 5.1.8	Improve Wales RO web pages by Spring 2010.	Wales Ro. Comms and ER.
RP 5.1.9	Quarterly update of NIRO web page to address customer and stakeholder needs.	Northern Ireland RO
RP 5.1.10	Consider the structure of the FoI web pages and possibly re-design for greater effectiveness.	FoI GPE. FoI Complaints. FoI Policy. Comms and ER.

Action 5.2		
Continue to produce web content tailored for specific sectors and life events, and new consumer information for individuals, producing around four new user journeys a year.		
Anticipated outputs and volumes		
RP 5.2.1	Publish around four new user journeys based on life events and sectoral needs.	Comms and ER. DPP
RP 5.2.2	Reorganise “what we cover” “for public” and “for organisations” sectors.	Comms and ER.
RP 5.2.3	Produce searchable “case notes” for the web site summarising DPA and PECR cases to give practical examples of how we apply the law.	CAD Comms and ER

Action 5.3		
Continue to improve the two key drivers of customer satisfaction by taking measures to improve our speed of response and customer information.		
Anticipated outputs and volumes		
RP 5.3.1	Customer satisfaction research for complainants.	Comms and ER.
RP 5.3.2	Produce and implement a plan to improve CAD casework response times.	CAD
RP 5.3.3	To review and develop all customer service processes to reduce avoidable customer contact with the ICO and to encourage “channel shift” where this can increase operational efficiency without negative impact on service quality.	Frontline Ops. IS.
RP 5.3.4	Establish a “customer contact steering group” to coordinate all aspects of the way we manage and deliver our contract with its customers.	Frontline Ops IS.

**Enforcing
Aim 1**

Take purposeful risk-based enforcement action where obligations are ignored, where codes or guidance are not followed, and where examples need to be set or issues clarified.

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Action 1.1

Ensure that procedures and practices for prioritising and targeting cases deliver the aims of our Freedom of Information Enforcement Strategy and our Data Protection Regulatory Action Strategy. For freedom of information cases, take proportionate and risk-based action against those public authorities which fall short of expected standards. For data protection cases, selectively initiate, support or take on cases requiring enforcement or other forms of formal regulatory action, and ensure that our regulatory action work reinforces our other activities and adopts a robust approach, taking considered risks.

Anticipated outputs and volumes

E 1.1.1	To identify and maximise compliance levels in concert with RAD and GPE.	Northern Ireland RO. GPE and RAD.
E 1.1.2	Identify suitable candidates for local data protection enforcement and initiate action on compliance or audit.	Wales RO. RAD.
E 1.1.3	Monitor FoI compliance levels of Welsh public authorities and identify suitable targets for local enforcement action.	Wales Ro. GPE.

<p>Action 1.2 Continue to encourage and promote good practice by raising the profile of our enforcement activities; highlighting examples of good and poor practice, particularly repeated or systemic poor practice; and releasing information on the types of complaints we receive and on the organisations complained about.</p>		
<p>Anticipated outputs and volumes</p>		
E 1.2.1	To issue press releases to accompany practice recommendations and enforcement notices, for the wider educative value both for public authorities and citizens.	FoI GPE. Scotland RO. Comms and ER.
E 1.2.2	Create compliance audit communications policies and procedures.	Comms and ER. RAD.

<p>Action 1.3 During 2009/10, carry out spot checks to assess whether selected government departments are processing personal data in line with their obligations and best practice, whilst at the same time developing our capacity to undertake other data protection inspections.</p>		
<p>Anticipated outputs and volumes</p>		
E 1.3.1	Compliance audit of government departments. Expected volumes 9 Report within 8 weeks.	RAD.

<p>Action 1.4 Continue to work with the government to deliver new statutory powers and penalties to help address data protection risk. Once these are in place, and adequately funded, implement an updated and strengthened Data Protection Regulatory Action Strategy.</p> <ul style="list-style-type: none"> • using additional staff and appointed experts to carry out audits and other inspections; and • imposing the new sanctions in the most serious cases. 		
<p>Anticipated outputs and volumes</p>		
E 1.4.1	Written communications plan for data protection penalties announcement and longer term treatment of communications of penalties.	Comms and ER. RAD.
E 1.4.2	Compliance audits of data controllers. Expected volumes 12 Adequacy within 4 weeks. Compliance report within 6 weeks.	RAD
E 1.4.3	Monitor current protocols for joint working with OFT and OFCOM. Agree protocol with FSA.	RAD
E 1.4.4	Appointment of Audit Development Manager. Arrangements in place by 1 st May 2009.	RAD
E 1.4.5	Appointment of technical adviser to assist with technical audits.	RAD

**Enforcing
Aim 2**

To ensure organisations which handle personal information comply with their obligation to notify with us.

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Action 2.1

Maintain the number of organisations (data controllers) notifying with us. This is to be achieved by reminding data controllers to renew their notification, by targeting under notified-sectors and large organisations, and by encouraging the use of direct debits.

Anticipated outputs and volumes

E 2.1.1	Complete the project to scope the notifications sectors.	Comms and ER Notification.
E 2.1.2	Highlight the need to notify through trade associations and by publicising non-notification prosecutions.	Notification. RAD. Comms and ER.
E 2.1.3	Encourage and promote direct debit on notification documents, explaining the benefits.	Notification. Comms and ER
E 2.1.4	Research and review the extent of local non-notifications, targeting identified under notified sectors as appropriate.	Northern Ireland RO. Wales RO, Scotland RO RAD and Notification.

Action 2.2

We anticipate at least 40,000 new notifications and 262,000 renewals each year, with each transaction completed within five working days.

Anticipated outputs and volumes

E 2.2.1	Complete an estimated 40,000 new notifications and 262,000 renewals with each transaction dealt with within 5 working days.	Notification.
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Action 2.3		
We anticipate at least 60,000 changes to notification entries every year, with each change completed within 10 working days.		
Anticipated outputs and volumes		
E 2.3.1	Complete an estimated 60,000 changes to notification entries with each transaction dealt within 10 working days.	Notification.

Action 2.4		
Implement revised data protection fees regulations during October 2009.		
Anticipated outputs and volumes		
E 2.4.1	Once the details are known, to ensure that processes are in place to implement a tiered notification fee. This is to include updating DUIS, training staff and writing guidance.	Notification.
E 2.4.2	Provide a communications plan and relevant communication tools (eg publications web copy, media relations, letters etc) to explain and promote the new notification system; work on the DUIS project to ensure we can use the database to contact our customers.	Comms and ER. Notification.

Developing and improving Aim 1

To achieve a clear, articulated and lived culture with a recognisable ICO feel that reflects our values and positioning.

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Action 1.1

Continue to encourage greater engagement among staff, by further improving internal communications with the emphasis on developing the role of managers, modernising our materials, celebrating success and creating opportunities for staff involvement. Our staff survey will measure progress.

Anticipated outputs and volumes

D&I 1.1.1	Ensure that actions arising from the staff survey and the Bullying and Harassment survey are identified and implemented.	Executive Team E&D Committee HR
D&I 1.1.2	Ensure effective communications with staff and managers about HR matters and initiatives.	HR Comms and ER.
D&I 1.1.3	Be proactive to ensure relationships are developed across the ICO, by fostering and encouraging face to face meetings between Wilmslow and regional offices.	Northern Ireland RO. Scotland RO Wales RO
D&I 1.1.4	Prepare comms plan for the new Commissioner.	Comms and ER.
D&I 1.1.5	Redesign the Informer using appropriate software fit for purpose.	Comms and ER. IS.
D&I 1.1.6	Devise ways to celebrate success.	Executive Team
D&I 1.1.7	Devise ways to promote the ICO's competencies and develop our culture.	Executive Team
D&I 1.1.8	Arrange IC's leaving party for June 09.	Comms and ER.
D&I 1.1.9	Celebrate 25 years of the ICO.	Comms and ER.
D&I 1.1.10	Refresh our internal communications strategy.	Comms and ER.

<p>Action 1.2 Continue to promote equality and diversity in all we do, in line with our Equality and Diversity Strategy, eliminating where possible any barriers that prevent people accessing our services or enjoying employment opportunities within the ICO.</p>		
<p>Anticipated outputs and volumes</p>		
D&I 1.2.1	Implementing our Equality and Diversity Strategy and complete impact assessments.	E&D Committee

<p>Action 1.3 Make the changes necessary to accommodate a significantly greater number of staff and an expanded role for the ICO; ensuring workforce planning strategies and working practices are capable of dealing with change and growth in the ICO's role and funding.</p>		
<p>Anticipated outputs and volumes</p>		
D&I 1.3.1	Produce a plan for the future development of the Scotland Office within the expanded role of the ICO, focusing in particular but not exclusively on a regionally based audit team.	Scotland RO.
D&I 1.3.2	Complete the Health and Safety review in line with the Health & Safety Committee action plan.	HR.
D&I 1.3.3	Support accommodation change with internal communications plan, materials and tools.	Comms and ER. Facilities.
D&I 1.3.4	Provide and implement IT solutions to support the accommodation policy.	IS. Facilities.
D&I 1.3.5	Provide security advice relating to accommodation change.	IS. Facilities.
D&I 1.3.6	Full roll out of mobile technological solutions.	IS. Finance
D&I 1.3.7	Support for office moves and relocation of staff.	IS. Facilities.

**Developing and improving
Aim 2**

To achieve recognisable world class performance through motivated staff who are committed to the ICO's goals and success.

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Action 2.1

Continue to implement our HR Strategy which is part of an integrated approach to the leadership, development and modernisation of the ICO, with a focus on helping everyone to get the best out of themselves and each other, covering:

- training, development and talent management
- recruitment and retention
- health and well-being
- reward and recognition
- modern and flexible working practices and
- Diversity and fair treatment.

Anticipated outputs and volumes

D&I 2.1.1	Develop and review HR policies in line with the agreed schedule.	HR
D&I 2.1.2	Continue to explore opportunities for improvement in terms of reward, ways of working and health and wellbeing.	HR

Action 2.2

Ensure 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.

Anticipated outputs and volumes

D&I 2.2.1	In line with the L&D Strategy, develop a programme of skills analysis and deliver training as required.	HR
D&I 2.2.2	Procure and deliver accredited coaching skills training for managers.	HR

Action 2.3		
Continue to develop a package of pay and benefits which is right for the job and ensures that we can attract and retain the best people.		
Anticipated outputs and volumes		
D&I 2.3.1	Submit and agree a new pay deal for 2010/11 in time to pay the agreed increase to staff in July 2010.	HR

Action 2.4		
Continue to prioritise the training and development of staff in line with organisational requirements, with an emphasis on role specific competencies for freedom of information and data protection, and on helping staff to be quick, responsive and innovative.		
Anticipated outputs and volumes		
D&I 2.5.1	To run two ISEB DP courses for 10-12 candidates each with 100% pass rate.	DPP
D&I 2.5.2	To provide training for non-DP staff including contributing to training for new Fol staff.	DPP
D&I 2.5.3	To arrange monthly team building activities in liaison with HR. To include one session on team building itself. Spring 2009.	Wales RO. HR.
D&I 2.5.4	With the Fol training steering group, to establish a Fol training framework and training manager role (within the Fol Policy Team) who will work with trainers across Fol to deliver training based on need.	Fol Policy. Fol Complaints. Fol GPE. HR
D&I 2.5.6	Acknowledging the proportion of relatively new and probationary staff within CST, continue to develop and deliver effective training and induction programmes which complement the wider 'Learning and Development' strategy.	Frontline Ops HR
D&I 2.5.7	To explore the possibility of working towards an independently recognised accreditation in customer service.	Frontline Ops HR

Developing and improving Aim 3

To protect and promote the good reputation of the ICO.

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Action 3.1

Monitor our Communications and External Relations Strategy to ensure it will help us meet the challenges of the next three years, measuring the effectiveness of our communications, publishing key communications indicators and researching the views of the public, stakeholders, customers and staff.

Anticipated outputs and volumes

D&I 3.1.1	Run the annual track research programme 2009.	Comms and ER.
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Action 3.2

Continue to build a communications culture in the ICO, developing the ICO brand, planning communications in line with our Communications and External Relations Strategy, and responding to feedback.

Anticipated outputs and volumes

D&I 3.2.1	Develop a regional communications & external relations strategy with quarterly contact with Comms and ER and monthly PR submissions.	Northern Ireland RO.
D&I 3.2.2	Develop our virtual press office – phase 2.	Comms and ER.
D&I 3.2.3	Refresh our online strategy.	Comms and ER.
D&I 3.2.4	Investigate monitoring ICO mentions on blogs and social networking sites.	Comms and ER.
D&I 3.2.5	Write, publish and launch the Annual Report 2008/09	Comms and ER.
D&I 3.2.6	Edit and publish the Corporate Plan 2010 - 2013	Comms and ER. CSU

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D&I 3.2.7	Implement new ways of working within Comms and ER and run internal research on what others need.	Comms and ER
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Action 3.3

Improve the ICO's approach to recruitment to position ourselves as an employer of choice among prospective candidates during 2009/10 with an emphasis on electronic and inclusive communications.

Anticipated outputs and volumes

D&I 3.3.1	Support HR's recruitment improvement project with internal communications, web, print, corporate ID and media work.	Comms and ER. HR
D&I 3.3.2	Implement the Talent Management Strategy in line with the agreed action plan and timescales.	HR Executive Team

Developing and improving Aim 4

To work as effectively and efficiently as possible, making best use of our resources and gaining value for money.

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Action 4.1

Be an exemplar in our handling of information by continuing to improve our knowledge and records management, identifying new standards, revisiting and monitoring existing ones and meeting our internal compliance obligations.

Anticipated outputs and volumes

D&I 4.1.1	Complete a review of HR filing systems and implement any changes by March 2010.	HR
D&I 4.1.2	Complete the roll out of EDRM for non-casework documents and records.	IS
D&I 4.1.3	Review and implement the retention and disposal policy for all ICO records and documents.	The ICO with lead from IS.
D&I 4.1.4	Continue to develop and embed records management, developing and implementing policies and procedures, raising staff awareness and by auditing.	IS
D&I 4.1.5	Scope work for ISO27001 accreditation.	IS
D&I 4.1.6	Complete four data processor reviews.	IS
D&I 4.1.7	Update the asset classification guidance.	IS
D&I 4.1.8	Develop and implement CBT packages for using MERIDIO, and staff guidance on information handling.	IS
D&I 4.1.9	Review, update and publish IT security policies and guidance and review the existing CBT security package.	IS

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D&I 4.1.10	To undertake a case audit programme.	Northern Ireland RO.
D&I 4.1.11	To undertake a benchmarking exercise with another FOI team and a NO based regulator with one round table event and 1 meeting.	Northern Ireland RO. FOI complaints.

Action 4.2

With the aim of becoming carbon neutral, to investigate the actions the ICO can take to reduce its carbon footprint and to develop a sustainability plan by March 2010.

Anticipated outputs and volumes

D&I 4.2.1	To have developed a sustainability plan by March 2010.	Finance & Facilities. The rest of the office.
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Action 4.3

To look for ways of working more effectively and efficiently across the ICO.

Anticipated outputs and volumes

D&I 4.3.1	Reduce ICO spend on external costs for FOI appeals by 25% from the final 2008/2009 spend (Based on the assumption that appeal volume and nature of appeals is similar to 2008/2009)	FOI policy
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Developing and improving Aim 5

To improve our use of information technology to encourage efficiency, to keep pace with developments in society and to meet customer expectations.

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Action 5.1

Implement our Information Services Strategy to:

- Ensure the IT contract fulfils its potential;
- Refresh the current IT infrastructure to provide staff with a secure and robust IT platform;
- Review and replace core applications to meet changing business needs;
- Continually improve our ability to provide services to our stakeholders;
- Meet these needs cost-effectively.

Anticipated outputs and volumes

D&I 5.1.1	To complete the project to replace the “plan time” system by March 2010.	HR IS.
D&I 5.1.2	To complete the review and implementation of a refreshed IT infrastructure.	IS
D&I 5.1.3	Review and update internal service delivery procedures.	IS
	Deliver and implement processes for in-house configuration work.	IS
	Expand the internal capability for IT forensics to ensure two members of the IT team are trained.	IS
	Implement an IS internal communications plan.	Comms and ER support
	Provide support for website developments.	Comms and ER
D&I 5.1.4	Upgrade / replace stakeholder database application.	IS. Comms and ER.

<p>Action 5.2 Take forward a project to procure a new system for processing notification fees, replacing the current DUIS system. The new system to go live during 2010/11.</p>		
<p>Anticipated outputs and volumes</p>		
D&I 5.2.1	Scope and deliver changes to DUIS to support the introduction of a new tiered notification fee regime by October 2009.	IS. Notification. Finance and Facilities. HR.
D&I 5.2.2	Obtain approval for the business case for a replacement of DUIS.	IS. Notification. Finance and Facilities.
D&I 5.2.3	Appoint a manager for the replacement DUIS project, gather and document business and system requirements for the DUIS replacement and undertake the procurement of a technical solution to meet notification business requirements.	IS. Notification. Finance and Facilities. Comms and ER

<p>Action 5.3 Continue to modernise our processes, using new technology where appropriate, to speed up and improve communications with audiences and to complete our work in a more effective and efficient way.</p>		
<p>Anticipated outputs and volumes</p>		
D&I 5.3.1	Develop policies to support wider use of web based services.	IS.

Action 5.4		
Review and develop the ICO's use of management information and business intelligence solutions to aid decision making and identify opportunities to improve performance; integrating with replacement of the DUIS notification system (2010/11) and the CMEH casework system (2010/12).		
Anticipated outputs and volumes		
D&I 5.4.1	Develop and implement processes for in house configuration work and capacity to meet MI requirements.	IS.
D&I 5.4.2	To work with our IS team to review the information currently captured when progressing ICO casework.	Frontline Ops IS.
D&I 5.4.3	To develop our 'out of hours' and 'in queue' 'self service' facilities to provide customers with more information during times when our lines are busy or the office is closed.	Frontline Ops. IS.
D&I 5.4.4	To develop mechanisms to record the nature and outcome of calls made to the ICO and to explore the possibility of recording calls.	Frontline Ops. IS.
D&I 5.4.5	Reducing 'avoidable contact' with the ICO through the development of a more intuitive 'customer journey' across all channels.	Frontline Ops. IS.
D&I 5.4.6	Identification of opportunities to encourage "channel shift" where this would be more efficient for the ICO and would improve customer service.	Frontline Ops. IS.