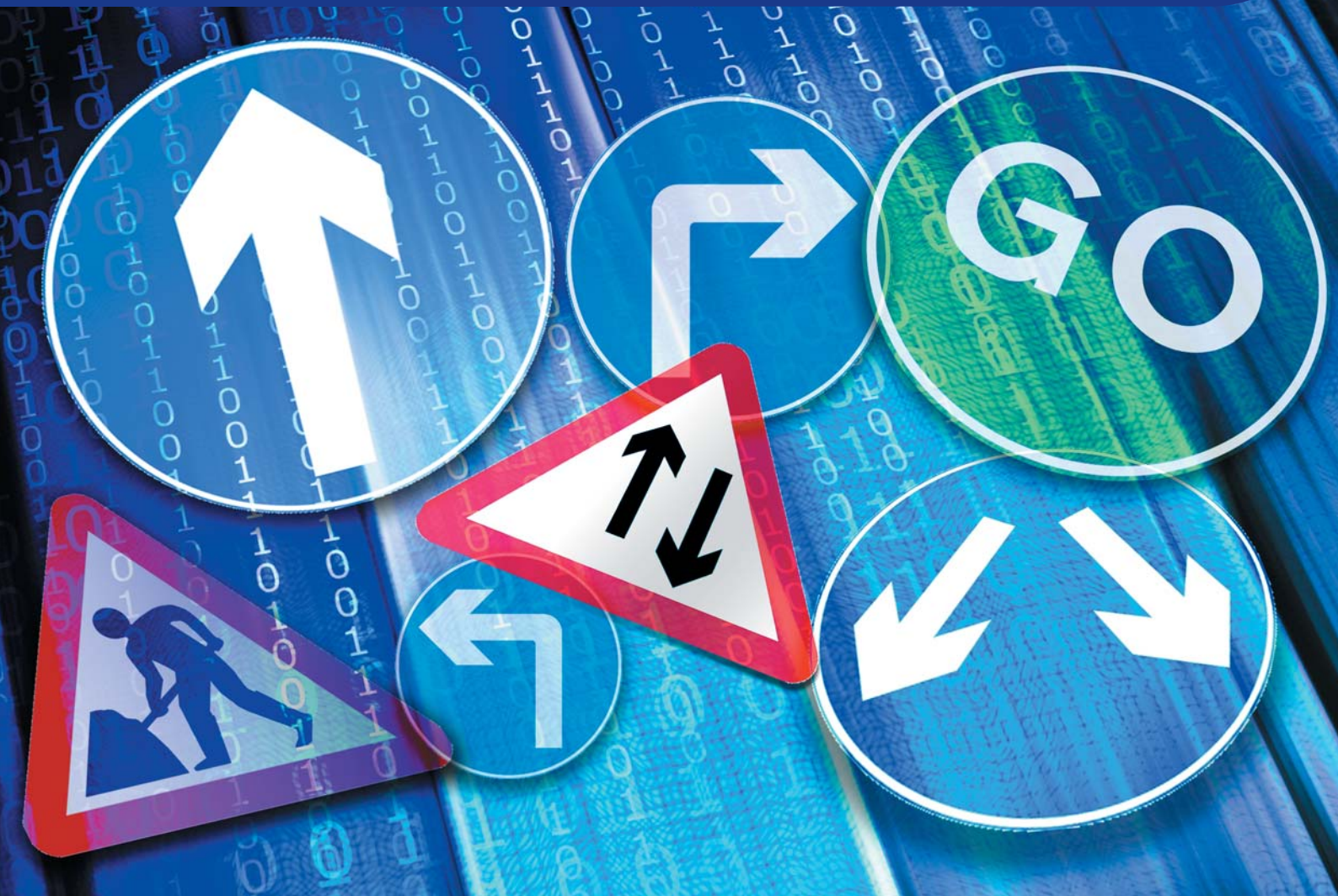


Corporate Plan 2006 - 2009

What and how?





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Commissioner's foreword



'At the ICO we are privileged to have an exciting and ever-stimulating range of responsibilities, stretching right across the public, private and voluntary sectors.'

This Plan sets out what we will be doing over the three year period from April 2006, and how we intend to get there. It rolls forward previous Corporate Plans, but adopts a simpler and slimmer approach, concentrating on the essentials. It provides the direction for more detailed plans and decisions.

Freedom of information has been described as a defining characteristic of modern democracy. For the UK the first year of freedom of information has been challenging but has gone well as a fundamental public service reform, with a high public profile for the Information Commissioner's Office (ICO). An extraordinarily diverse range of information which previously remained confidential has reached the public. Culture is starting to change across the public sector. The initial surge of requests and complaints has placed strains upon public bodies and upon us at the ICO. Additional short-term resources will help us tackle the backlog of cases that built up during the first year. Streamlined procedures, an ever-increasing familiarity with the issues and structural changes will improve and sustain performance. Freedom of information is still a very new concept in practice and lessons are being learnt on all sides. As we move forward the boundaries will be tested further. There will be controversies and there will be continuing uncertainties in some areas, but our role remains crucial to the success of freedom of information.

At the same time, data protection presents both familiar and new challenges. The public ranks high standards of handling personal information as one of its top concerns, but the law is still seen as complex and too easy to use as an excuse for questionable activity. Whilst the law plays a vital role in protecting personal information, there can be tensions between this and other public policy objectives. We need to do more to spell out and help deliver the benefits in terms of privacy and respect for personal information. We need to continue our push for simplification and to tackle the myths. As the State assembles ever more information about people, and seeks to share it across traditional boundaries, we need to take a measured and responsible approach—ensuring the protection of privacy is given proper weight and the risks of a surveillance society are avoided as the intended benefits are delivered.

At the ICO we are privileged to have an exciting and ever-stimulating range of responsibilities, stretching right across the public, private and voluntary sectors. There are very few topics without a freedom of information or data protection angle. We are stretched, but we are aware of the importance of our independent role. We have been through the growing pains

associated with substantial enlargement to take on our new responsibilities and to establish a regional network. We have a healthy and strong appetite to get the best from worthwhile change and to harness the talents which we have assembled. My senior management team and I know that we can – and must – demonstrate strong and active leadership to achieve optimum performance with busy, involved and enthusiastic staff.

We have summed up our overall mission in terms of **“Promoting public access to official information and protecting your personal information”**. Our top priorities are:

- **Succeeding with our freedom of information responsibilities – deciding cases speedily 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 – simplifying and 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.**

These high-level goals are elaborated in this Plan. Achieving these goals 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 style with a horizontal line underneath the name.

Richard Thomas

June 2006

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;
- ensuring that personal information is properly protected.

As far as possible, these outcomes – **good practice** – should be achieved as a natural consequence of the way in which organisations behave, especially in their dealings with members of the public. Compliance with the law is not a goal in itself. Society has high expectations and expects responsible behaviour. The benefits of freedom of information and data protection should be achieved without the ICO’s constant supervision or intervention. We should recognise and encourage organisations striving for good practice, but be tough on those who deliberately or persistently fail to deliver the benefits intended by the law. This approach minimises compliance costs and complexity.

We must make sure that we make the best use of all our functions – separately and in combination – in the most cost-effective ways to bring about the desired outcomes.

Three types of function

Educating and influencing

Promoting good practice, rights and obligations
Simplifying and making it as easy as possible for organisations to know how they should behave
Targeting our efforts where needs are greatest and where we can secure the greatest impact

Resolving problems

Providing effective solutions and remedies to real problems
Prioritising robustly so as to pursue only 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 are greatest
Prepared to take measured risks of our own

Our top priorities over the next three years

There are three priorities which will continue to dominate everything we do across the ICO:

- **Succeeding with our freedom of information responsibilities – deciding cases speedily 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 – simplifying and 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 require priority treatment over the next three years, starting in April.

From April 2006

- Early implementation of plans reflecting lessons learned from the initial handling of freedom of information and environmental information complaints and early tribunal decisions – aiming to use existing and additional resources to tackle the initial backlog and achieve substantial improvements in turnaround time, while ensuring good quality decision-making.
- A more harmonised approach – especially in terms of better-documented policies, procedures and service standards – to the handling of both freedom of information and data protection casework.
- Proactive programmes to strengthen public confidence in data protection through clear guidance to organisations, stronger promotion of benefits, risk-based enforcement and proposals for legislative reform.
- A structured effort to embed the benefits of the Senior Leadership Programme in order to improve the active management of the ICO – particularly addressing performance and human resource issues.

From April 2007

- Surveys, audits and bench-marking to demonstrate leadership/management improvements.
- Closer integration and harmonisation of policies and procedures on freedom of information and data protection.
- Assuming that the volume of freedom of information complaints has declined, a more active programme to stimulate proactive disclosure by public authorities and a better understanding by the public of their rights.
- Successful completion of our IT re-procurement.

From April 2008

- Integration, probably on a sectoral basis, of freedom of information and data protection casework.
- Capacity to handle additional complaints arising from national initiatives such as ID cards, electronic NHS records and wider information sharing.
- Based on the ICO's first three years' experience of regulating freedom of information, the identification of possible improvements to freedom of information/ environmental information legislation.

2. Aims and objectives



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

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: Introduce improved case and performance management and other reforms as set out in the Freedom of Information Improvement Project to make the most efficient use of our resources, clear backlogs, and to meet the service standards set out below:

| | Estimated number of complaints received | Completion of Case Reception processes | Age of cases at closure | | | |
|--------|---|--|-------------------------|-----------------|------------------|------------------|
| | | | 30 days or less | 90 days or less | 180 days or less | 365 days or less |
| 2006-7 | Carry forward from 2005/6 1,275 cases New cases received 2400-2500 | 98% within 14 days | 35% | 40% | 50% | 80% |

The figures reflect anticipated performance averaged over the year as a whole. The targets relate to all cases that we close, including those already in the backlog.

In April 2006 the DCA confirmed that additional resources, providing a net increase of £650k, would be made available for 2006/7 to enable the ICO to tackle a backlog of 1,275 cases. This fell short of the extra grant requested. We are however making substantial procedural and structural changes to improve productivity. Although the ICO cannot commit to clear the backlog by March 2007 it will use its best endeavours to do so.

In September 2006, once the changes have bedded in, the ICO will publish a progress report with a firm indication of when the backlog will be cleared. This report will also give firm service standards for 2007/8 and 2008/9 which are expected to show a significant improvement on those set out above.

Objective 2: Ensure high-quality decision-making so that, by March 2008, our approach is being endorsed in 75% of formal notices taken to the Information Tribunal.

Objective 3: Ensure prioritisation and good publicity for high impact and other precedent-setting cases so that public authorities have clear messages about what is expected from them.

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: Produce simple, clear and targeted advice, assistance and guidance for public bodies and individuals – particularly drawing on ICO and tribunal casework.

Objective 2: Fulfil a structured programme, and exploit opportunities, to promote good practice (especially proactive disclosure) by public authorities and to provide the public with a better understanding of their rights.

Objective 3: Ensure healthy communication lines are established and maintained with key external stakeholders.

Objective 4: 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.

Aim 3 (Data Protection)

Promote good practice by organisations that handle personal information

Objective 1: Take the lead in simplifying data protection and promoting good practice through proactive encouragement and clear and unequivocal guidance targeted on defined audiences so that organisations have confidence about what they need to do and citizens understand their rights.

Objective 2: Issue and/or 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: Lead policy debate on selected issues regionally, 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: Articulate and advance policies, procedures and legislative reforms which will improve the effectiveness of data protection in practice.

Aim 4 (Data Protection)

Run an efficient and helpful Notification service

Objective 1: Develop and implement cost-effective programmes to tackle organisations which have not notified in accordance with their obligations, aiming to increase the register to 285,000.

Objective 2: Handle at least 40,000 new notifications, 245,000 renewals and 30,000 changes each year within acceptable turnaround times.

Objective 3: Handle at least 75,000 telephone and 25,000 written enquiries relating to Notifications each year. Answer 95% of calls within 1 minute.

Objective 4: Put in place technological and organisational changes aimed at improving customer service and efficiency, which will mean that 70% of new notifications and renewals are completed electronically by March 2007.

Aim 5 (Data Protection)

Provide an efficient and valued Casework and Advice service

Objective 1: Operate an ICO Telephone Helpline to provide assistance to organisations needing help to get it right and to individuals asking about their rights – anticipating at least 120,000 calls each year, with the aim of answering 95% within 1 minute.

Objective 2: To operate an ICO Customer Service Team that acknowledges all ICO complaints (both freedom of information and data protection) within 5 working days of receipt.

Objective 3: To resolve written data protection enquiries and complaints within the following timescales:

| | Estimated number of complaints and written enquiries | Completion of Case Reception processes | Age of cases at closure | | |
|--------|--|--|-------------------------|-----------------|------------------|
| | | | 30 days or less | 90 days or less | 180 days or less |
| 2006-7 | 20,000 - 22,000 | 98% within 14 days | 40% | 90% | 98% |
| 2007-8 | 20,000 - 22,000 | 98% within 14 days | 45% | 93% | 99% |
| 2008-9 | 20,000 - 22,000 | 98% within 14 days | 50% | 95% | 99% |

Objective 4: Ensure that we only take on complaints where we are satisfied that:

- individuals have legitimate grievances about the handling of their personal information that raise issues of substance;
and
- we can, and should, take effective action.

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/issues requiring formal regulatory action – through one or more of audit, negotiated resolution, investigation (civil and criminal), prosecution, service of information and enforcement notices and “stop now” orders.

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

Objective 3: Ensure that all our regulatory action work:

- reinforces and dove-tails with the work of the Casework and Advice Division and the Guidance and Promotion Division;
- 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 substantially in recent years, absorbing new functions and many new people. Our staff are keen to be better involved, with a healthy 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 well-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 develop our Senior Leadership Programme with all senior managers committed to:

- making a difference where it matters
- communicating effectively
- valuing and supporting our staff
- improving continuously
- setting and getting acceptable performance standards
- commanding respect.

(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 team and regional office
- better integrate the contribution of separate teams
- are sufficiently flexible to accommodate new or emerging demands
- are carried forward into personal objectives for each year
- are monitored regularly.

(c) Performance Management

By mid-2006 we will document improvements which have been achieved, and those which remain to be captured, on:

- target setting and monitoring
- policies and procedures
- quality control
- management information
- 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
- develop fit-for-purpose core applications that meet the needs of the ICO
- continually improve our ability to provide services to our stakeholders – including a full online Notification process by the end of 2006
- meet these needs cost-effectively.

(e) Regional Offices

Each regional office will adopt its own annual business plan, responding to the local environment and demands, reinforcing its contribution to overall ICO aims and objectives by feeding into the ICO Business Plan.

(f) Review and compare

By mid-2007 we will have undertaken surveys, audits and bench-marking exercises to demonstrate the results of leadership, management and performance improvements, where possible by reference to comparable organisations.

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 adopt a new Human Resources Strategy to be fully operational – particularly through updated HR policies and procedures – by March 2007. This will focus on helping everyone to get the best out of themselves and each other – training, good quality work, job satisfaction, recognition, personal development, diversity and fair treatment.

(c) Values

We will renew our commitment to our organisational values:

- Effective communicators
- Ethical in our behaviour
- Professional
- Decisive
- Clear
- Cooperative
- Making it happen
- Proud of what we do

Commitment 3 – An influential ICO

(a) Ensuring the reputation for success

In line with our Communications & External Relations Strategy, we will publish indicators to measure our reputation from the perspective of both organisations and individuals and will seek to maintain and improve on results.

(b) Communications and external relations

We will adopt a strategic approach to communications and external relations initiatives by implementing clear, relevant and consistent sets of information to targeted audiences, with performance tracked by key indicators.

(c) Influencing policy and practice

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

(d) Quality of communications

We will continue to improve the quality of specific communication methods, including:

- complete website improvements by the end of 2006
- structured plan for closer working with key intermediary bodies and stakeholders to be adopted by mid-2006 and fully operational by March 2007
- Internal communications plan to be updated during 2007-8

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 explore the scope for unit costing to be used as an efficiency driver for casework.

(b) Data Protection funding

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

| 2006/7 | 2007/8 | 2008/9 |
|---------------|---------------|----------------|
| £9.74 million | £9.93 million | £10.13 million |

(c) Freedom of Information funding

Reflecting the need for temporary additional funding for 2006-7 to enable us to clear the backlog caused by the initial surge of freedom of information/environmental information complaints, we anticipate a grant aided budget for freedom of information as follows:

| 2006/7 | 2007/8 | 2008/9 |
|---------------|---------------|---------------|
| £5.65 million | £4.70 million | £4.70 million |

Notes:

Notes:

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