

Executive Team (ET) minutes

25 September 2023

Details of attendees are provided at the end of the minutes.

1. Introductions and apologies

- 1.1. Apologies for absence were received from Emily Keaney, Jen Green and Stephen Bonner.

2. Declarations of interests

- 2.1. No declarations of interests were made.

3. Matters arising from the previous meeting

Minutes

- 3.1. The minutes of the previous meeting had been approved as a correct record.

Actions

- 3.2. All actions from previous meetings had been completed.

4. Approach to Section 132 of the Data Protection Act

- 4.1. Ange Balakrishnan provided an update regarding progress with work to develop our approach to Section 132 of the DPA. This included internal guidance produced by knowledge services (including draft wording shared with ET), and development of additional processes within the media team, to ensure that any S132 factors were considered prior to communications. The updated media processes would be shared with ET once fully developed.

**ACTION: Ange Balakrishnan to provide updated media processes in relation to S132 factors to ET for comment.
Due date: 30/10/23**

- 4.2. ET agreed that, broadly speaking, analysis of information the ICO has have received in the course of its duties (such as trends in complaints data) was considered information the ICO has generated for S132 purposes.
- 4.3. ET provided feedback on the proposed internal guidance. The feedback included: providing some context about the purpose and

importance of S132; creating a clearer distinction between principles regarding disclosures we choose to make under S132 and principles regarding maintaining confidentiality of information; and the importance of including examples of situations for application of S132 and user testing of the guidance prior to it going live.

- 4.4. ET also discussed the links between S132 and inside information, with an inside information policy currently being finalised, and agreed that it was important to align these two pieces of work. ET also discussed links between this guidance and work that the Digital Regulatory Cooperation Forum (DRCF) was conducting regarding protocols for sharing information between DRCF regulators. ET agreed that this guidance should form the ICO's output to this DRCF work, and additional work in that area could be stood down.

ACTION: Stephen Almond to stand down additional work in relation to developing protocols for sharing ICO information with DRCF regulators. Due date: 30/10/23

ACTION: Jen Green to provide an update on progress with development of S132 guidance to the next ET meeting. Due date: 30/10/23

ACTION: Jen Green to provide Executive Team with the final version of the internal guidance on S132 for sign off, prior to internal publication. Due date: 20/11/23

5. [Recent and upcoming Board-level meetings](#)

- 5.1. Louise Byers joined the meeting to discuss the outcomes of recent Board-level meetings and the draft agendas for future meetings.

6. [Executive Team work programme](#)

- 6.1. ET discussed the work programme for future meetings, noting that the work programme indicated a very large agenda for October's ET meeting. ET discussed whether further ET meetings would be required to accommodate the required discussions, noting that some of the items within the work programme may not require ET discussion. ET also discussed the additional work that was currently ongoing in further developing the medium and long-term ET planning horizon.

7. Monthly cyber security dashboard

- 7.1. Rob Holtom presented a report setting out the monthly cyber security dashboard.
- 7.2. ET discussed the completion rate of mandatory training and steps to take to ensure that the completion rate improved.

8. Any other business

Staff summer event

- 8.1. ET reflected on the staff summer celebration which had taken place the previous week and had seen high levels of participation and positive feedback. ET agreed that the quality of questions asked by staff was excellent, providing a good level of challenge on some difficult issues and being extremely constructive. ET agreed that it would be beneficial to hold further similar events with in-person attendance, as this also had benefits in building internal networks.

9. Key messages to staff

- 9.1. ET agreed that the key messages to staff from the meeting would be:

ACTION: Chris Braithwaite to publish the key messages on Iris. Due date: 29/9/23

Attendance

Members

Angela Balakrishnan	Executive Director of Strategic Communications and Public Affairs
Claudia Berg	General Counsel
John Edwards	Information Commissioner
Paul Arnold (Chair)	Deputy Chief Executive and Chief Operating Officer
Rob Holtom	Executive Director (Digital, Data, Technology (DDaT), Transformation and Delivery)
Stephen Almond	Executive Director, Regulatory Risk

Attendees

Andrew Rimmer	Private Secretary to John Edwards
Farhana Ahmed	Private Secretary to Rob Holtom
Fiona Simkiss	Private Secretary to Jen Green
Laura Tomkinson	Group Manager, Corporate Governance
Louise Byers	Director of Risk and Governance
Rebecca Bradbury	Private Secretary to Paul Arnold
Sarah Delahunty	Private Secretary to Emily Keaney

Tom Parkman

Secretariat

Chris Braithwaite

Private Secretary to Claudia Berg

Corporate Governance Manager