

Executive Team (ET) minutes

18 December 2023

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

1. Introductions and apologies

- 1.1. ET welcomed Louise Locke to her first ET meeting.
- 1.2. Apologies for absence were received from Claudia Berg, Rob Holtom and Stephen Bonner.

2. Declarations of interests

- 2.1. Stephen Almond declared an interest in item 4 regarding the role of Executive Director, Regulatory Risk, as he was the current postholder. ET agreed that it was appropriate for Stephen Almond to remain in the meeting for discussion of this item, as the discussion was regarding the post rather than the postholder, and he would have valuable insight into the role.
- 2.2. Stephen Almond confirmed that he would leave the meeting at any point during discussion of this item if ET preferred.

3. Matters arising from the previous meeting

Minutes

- 3.1. The minutes of the previous meeting were approved as an accurate record.

Actions

- 3.2. Jen Green reported that the updated section 132 guidance would be circulated by the end of the week. ET noted the updates to actions set out within the meeting papers.

4. Executive Director of Regulatory Risk

- 4.1. Paul Arnold presented a report setting out proposals for the future of the role of existing role of Executive Director, Regulatory Risk. This role was currently established on an interim basis.
- 4.2. ET reflected on the successes and challenges over the last nine months during the trial period of this role. They particularly highlighted the significant benefits of the additional expertise as part of ET and Management Board discussions, as well as the

benefits from increased collaboration. ET also discussed areas where further collaboration was possible.

- 4.3. ET particularly discussed the challenges of silos and boundaries and the work that was being done to reduce these challenges, and whether the Executive Director role would mitigate or contribute to those risks. ET agreed that these risks would remain regardless of the approach to the Executive Directorate. Therefore, the key was to ensure continued work to actively identify and mitigate these risks, particularly in relation to investigations, policy, and stakeholder engagement. ET also commented on the importance of their own collective role in leading this.
- 4.4. ET agreed that the benefits of permanently establishing the post and Executive Directorate, particularly in relation to dedicated expertise and ownership of responsibility for key technological matters (such as AI), were likely to outweigh the silo risks.
- 4.5. ET also discussed the links between the Regulatory Risk Executive Director role and the regulatory risk review project, particularly in relation to ensuring that there was clarity in relation to responsibilities for investigations, particularly between Regulatory Supervision, Regulatory Risk and Legal Services. This would be progressed through the regulatory risk review project.

ACTION: Corporate Governance to ensure that discussion takes place through the regulatory risk review project to provide clarity of responsibilities between Regulatory Risk and Regulatory Supervision, particularly in relation to Investigations. Due date: 29/1/23

- 4.6. ET also discussed the job title of the Executive Director and Directorate, to consider whether "Regulatory Risk" accurately described the full scope of the role, particularly regarding the role in relation to emerging technology.

Decision

- 4.7. ET agreed to establish the role of Executive Director, Regulatory Risk as a permanent position, noting the potential amendment of the job title.

ACTION: Jen Green to authorise People Services to commence recruitment for the Executive Director, Regulatory Risk, including facilitating discussion between

ET members regarding the job title for the role. Due date: 29/1/23

5. Future funding model and financial planning

- 5.1. Paul Arnold, Jen Green and Louise Byers provided ET with an update regarding development of the future funding model and information of financial planning for the remainder of 2023/24 and for 2024/25.
- 5.2. ET also discussed the delay in receiving the outcome from DSIT of plans to review our funding model. We are expecting this outcome to be received very soon, but it is making longer term financial planning much more challenging than usual.
- 5.3. ET particularly discussed whether there were ways to further increase acquisition levels. ET was informed that the teams were continuing to attempt to identify ways to maximise acquisitions, including exploring behavioural insights to maximise the effectiveness and efficiency in acquisition. However, it was unlikely that significant additional funding would be realised through this work.
- 5.4. ET discussed the importance of reviewing all reasonably controllable costs, both to mitigate financial challenges and to maximise spend directed towards organisational priorities. ET also discussed the proportion of the budget which was currently funded through retention of fine income, noting that this arrangement was set up to be relatively cost neutral, with the retained income funding regulatory activity.

Decision

- 5.5. ET agreed that there should be no further recruitment or new spend on areas that are not directly linked to delivery of agreed organisational priorities.
- 5.6. ET agreed that any underspends in Directorate budgets would return to the overall corporate budget.
- 5.7. ET agreed that where planned spend was linked to organisational priorities, it may be able to go ahead but should be subject to consultation with Finance and/or People Services.

6. Establishment Committee and resource allocation

- 6.1. Jen Green presented a report setting out the proposed approach to management of Establishment Committee and resource allocation.

- 6.2. ET requested that they be provided with an overview of the requests that have been made to Establishment Committee over the past year. This would allow ET to gain assurance that the roles being proposed to Establishment Committee were consistent with the overall strategic direction.

ACTION: Jen Green to provide ET with an overview of the requests that have been made to Establishment Committee over the past year. Due date: 29/1/23

- 6.3. ET's discussion focused on the role of Establishment Committee in providing a check and balance in terms of ensuring that all controllable spend was directed towards organisational priorities and causes. ET noted the importance of ET's role in providing clarity to Establishment Committee on priorities, causes and the attendant skills required, to enable Establishment Committee to be effective in this role.
- 6.4. ET also discussed the role of Establishment Committee in relation to Directorate Target Operating Models (TOMs) and agreed that TOMs should be considered by Establishment Committee in the first instance but where they requested significant new investment, they would be referred to ET.

Decision

- 6.5. ET asked that directors do attend for their requests and that a delay in the process is acceptable to be able to ensure thorough scrutiny takes place. ET agreed the other proposals set out in the report.

7. Children's privacy strategy

- 7.1. Emily Keaney, Ange Balakrishnan and Stephen Almond provided an oral update on proposed options for children's privacy priorities in this area for the next 12 months, as well as longer term priorities.
- 7.2. ET particularly discussed the importance of the "problem statement" at the outset of each piece of work and agreed that it was vital that ET modelled this and consistently reinforced the importance of it.
- 7.3. ET also discussed the lessons learned from children's privacy work to date, particularly in relation to the benefits and challenges in cross-office collaboration.

8. Annual report 2023/24 – options

- 8.1. Jen Green presented a report setting out the proposed approach to the development of the annual report for 2023/24.

Decision

- 8.2. ET agreed the approach to be taken as set out in the report.

9. Data Protection Practitioners Conference (DPPC) lessons learned

- 9.1. Ange Balakrishnan and Kirsty Keogh presented a report setting out the lessons learned from this year's DPPC and explaining how these were proposed to be implemented in future years.

- 9.2. ET welcomed the proposals for extending the DPPC brand into other events, and the ambition of the potential satellite events throughout the year.

- 9.3. ET discussed the resource requirements for hosting satellite events, and questioned whether there was currently a sufficient evidence base to justify the increased resources. ET agreed that it would be preferable to expand the DPPC brand to existing planned activities (such as webinars or planned guidance and events relating to the DPDI Bill), but not arrange standalone DPPC satellite events.

- 9.4. ET agreed that the period up to and including the next annual DPPC could be used to gather further information to consider whether to devote further resources to dedicated DPPC satellite events.

- 9.5. ET also highlighted the importance of continuing to devote resources to speaking engagements at existing conferences, particularly those with significant overlap with the DPPC audience.

Decision

- 9.6. ET agreed to expand the branding of DPPC to other engagement activities, but to not arrange specific DPPC satellite events for the coming year.

10. Risk maturity assessment outcomes and actions

- 10.1. Jen Green presented a report providing ET with information of the outcomes of the recent risk maturity assessment and the actions identified as a result. She explained that this had also been discussed with SLT the previous week.

- 10.2. ET's discussion focused on empowerment, particularly in terms of the balance between managing risks to ensure that they did not occur and creating a culture of staff at all levels feeling empowered to take risks. The latter was a key step in increasing the organisation's risk maturity. ET commented that they needed to continue to support and empower this; this was a key aspect of the regulatory risk review project, but needed to also feed into the overall organisational culture.
- 10.3. ET agreed that this would be a useful subject for discussion at an ET/SLT planning session.

ACTION: Laura Tomkinson to facilitate discussion of the risk maturity assessment outcomes and actions at an ET/SLT planning session. Due date: 26/2/24

11. [Monthly cyber security dashboard](#)

- 11.1. ET noted a report setting out the monthly cyber security dashboard.

12. [Executive Team work programme](#)

- 12.1. ET noted the work programme for future meetings.

13. [Any other business](#)

Promoting EDI in recruitment

- 13.1. ET discussed progress to date in promoting EDI in recruitment processes, to maximise the reach of ICO recruitment into ethnically minoritised communities.
- 13.2. ET was informed that People Services was continuing to progress this work, and as this progressed there would be a role for ET and SLT members to advocate for this. ET also suggested that this could be a part of Establishment Committee's work in ensuring that promoting EDI was considered as part of the recruitment plans submitted to the Committee. ET would revisit this issue in due course.
- 13.3. ET also commented that this should be a key issue for EDI Board to consider and monitor.

14. [Key messages to staff](#)

- 14.1. The draft key messages would be circulated following the meeting.

ACTION: Laura Tomkinson to publish the key messages on Iris. Due date: 22/12/23

Attendance

Members

Angela Balakrishnan	Executive Director of Strategic Communications and Public Affairs
Emily Keaney	Deputy Commissioner (Regulatory Policy)
Jen Green	Executive Director, Strategy and Resources
John Edwards	Information Commissioner
Louise Locke	Executive Director, Customer Service
Paul Arnold (Chair)	Deputy Commissioner (Deputy CEO and Chief Operating Officer)
Stephen Almond	Executive Director, Regulatory Risk

Attendees

Andrew Rimmer	Private Secretary to John Edwards
David Squires	Private Secretary to Stephen Almond
Ellis Quinn	Private Secretary to Angela Balakrishnan
Farhana Ahmed	Private Secretary to Rob Holtom
Fiona Simkiss	Private Secretary to Jen Green
Izy Jude	Private Secretary to Stephen Bonner
Kirsty Keogh	Group Manager (Communications) (for item 9)
Laura Tomkinson	Group Manager, Corporate Governance
Louise Byers	Director of Risk and Governance and Interim Director of Finance (for item 5)
Mariam Boakye-Dankwa	Head of Commissioner's Private Office
Rebecca Bradbury	Private Secretary to Paul Arnold
Sarah Delahunty	Private Secretary to Emily Keaney
Tom Parkman	Private Secretary to Claudia Berg

Secretariat

Chris Braithwaite	Corporate Governance Manager
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