

## ICE consultation response

### Consultation

We had 54 responses to our consultation, all of which have been reviewed and evaluated by our project team and have been used to inform our approach as we move towards the introduction of our new service.

We would like to thank all those who took the time to provide us with feedback. We were also delighted that the feedback we received was so overwhelmingly positive and included some helpful suggestions which will help us continue to develop and improve our services.

Having taken all feedback into account we are now planning to launch our updated service on 1 April 2013.

### Further clarification

In addition to responding to the questions in our consultation a number of organizations asked for further clarification in some key areas. Hopefully the following information will be of assistance both to those who responded to the consultation and to our customers more broadly.

### Payment

Our consultation asked whether the introduction of a credit/debit card payment service would be helpful. Respondents were overwhelmingly positive about the prospect of being able to pay by credit/debit card online and by telephone. There were also some additional questions about our payments service more generally.

The aim for our new service will be to promote and prioritise the use of direct debit, debit card and credit card payment methods. Card payments will be available for organisations to use online and by telephone. We are committed to seeing as many transactions as possible take place online, by telephone or by email, keeping the use of regular mail to a minimum to reduce the associated paper and postage cost. We are intending to email both payment receipts and all formal documentation in easily printable PDF format. This will both speed up the registration process and reduce the environmental impact of the service.

We acknowledge the feedback provided by a small number of organisations who said they prefer to pay by cheque; where this is the case we will still be able to support this. Some organisations said they prefer to pay by BACS, due

to the higher administrative cost of processing BACS payments we will no longer accept these once the wider range of payment options has been made available.

Some organisations asked whether they would be able to make a single, consolidated credit/debit card payment for multiple registrations. Customers will be able to make consolidated payments using a credit/debit card by telephone. Payments made via our online payment portal will need to be made one registration at a time.

### **Providing a contact address for the public**

In our consultation we asked for opinions about the value of the ICO including contact details on the public register to make it easier for members of the public to find out more about the way organisations process information or to ask for information held by them.

Responses to this question were overwhelmingly positive with a number of suggestions about how this may work best for different sized organisations.

We agree with all those who had concerns about providing named contacts. Our new service will only be asking for job title or a team/department name to accompany any address, phone number or email address. The email address can be as specific or generic as the organisation prefers and it is important to remember that providing these contact details for the public will be entirely optional.

We agree with those who suggested that it may be helpful to simply provide a web link to take visitors to the public register direct to an organisation's website contact page, particularly where customers have a choice of multiple sets of contact details as is often the case for larger organisations. We will add this feature to our service in the future but it will not be available when we initially launch the new service.

### **Content and structure**

Perhaps the most significant change we are proposing is to the way the information held on the public register is structured. We are proposing to move to a more narrative based approach with organisations able to adopt/amend a general template provided by the ICO or draft their own narrative description of the way they process personal information. This new look register entry will also be able to include web links to things like an already existing privacy statement/policy.

Again we were delighted with the feedback in this area. There were however some understandable concerns which we can hopefully address by providing the following clarification.

The main area of concern related to the prospect that the register may appear less 'consistent' than it does at present. We don't see any reason for this to be the case. Four in every five existing register entries contain only the standard generic template provided by the ICO without any changes being made. We see no reason why this is likely to change. The remainder of the register is made up of entries from organisations that have amended one of these templates or created their own entry from scratch. As we do with our present regime the ICO will be providing approximately 200 'Nature of work templates' which organisations can either adopt in full or amend. We very much expect that the language we use in these templates will help ensure that where appropriate, descriptions published to the public register are as consistent as possible whilst also giving scope for genuinely out of the ordinary or very specific processing of information to be described in as meaningful a fashion as possible.

We have also taken note of the feedback from some respondents who suggested that whilst a narrative driven approach was helpful it may be more accessible if we could include information in list format. We have taken this on board and have opted to present more of the information in a list form rather than in sentence form. We hope this will make it easier for those who use the public register to check for very specific types of processing of information to continue to do this quickly and efficiently.

Likewise, where a particular trade body or association currently requires members of its body/association to include a very specific form of wording on their public register entry this will still be possible and we will certainly be keen to work with any such bodies/associations to help them develop any standardised wording.

## **Timing**

A couple of respondents to our consultation asked whether now was the right time for us to be updating our systems and services when a new European Data Protection Regulation may remove the need to register or notify under the Data Protection Act all together.

This is certainly something we have considered very carefully. Our current service uses a very old IT system which requires significant upgrade and modernisation simply to sustain it through to the introduction of any new EU regulation. Rather than invest further in this legacy IT platform we have decided to move our registration service to our main customer relationship management (CRM) system. This is a far more flexible and agile platform and will enable us to respond to any changes made by the introduction of any new EU regulation much more effectively. It also offers a great many options in the short term to improve the quality and reduce the cost of our transactions with customers.

## **Online solution**

Some respondents to our consultation asked for more information about our plans to deliver our registration service online.

We are planning to launch our new service in two main phases. The first phase will introduce a new range of payment options for our customers as described earlier in this document. These will be available online via a simple payment portal. Customers wishing to register or make changes to their registration will be able to do this by submitting forms available on our website or by ringing our helpline and quoting the necessary security information. Phase one also includes the changes to the content and structure of the public register outlined above.

The second phase of our service launch will introduce a full online self-service portal with customers able to: create a new registration, renew a registration, make changes to an existing registration and make any relevant payments online. With all changes immediately published to the public register without the need for ICO staff involvement unless advice or assistance is required. As this service will be available 24/7 we believe this offers our customers a more flexible and accessible service.

## **FAQ's**

### **What happens next?**

You do not need to do anything yet. We are planning to launch phase one of our new service in April 2013. We will soon start to contact those organisations whose current registration expires around this date to explain what they need to do. We will publish information on our website in good time to explain what you need to do if you want to register for the first time or to renew your existing registration after 1 April 2013. Our Helpline will also be ready to answer queries.

### **Can I still submit a new registration?**

If you have requested or are in the process of requesting registration (notification) forms you will need to ensure they are returned by 28 March 2013. This is the last date we will be processing registrations in our existing system. If you are returning the current registration form to us after 28 March 2013 we will convert your chosen template into the new, narrative format.

### **What happens if my register entry is due for renewal shortly?**

If we receive your renewal fee before 28 March 2013, we will process it in our current system. If we receive your renewal fee after 28 March 2013 we will renew your register entry and convert it into the new, narrative format.

## **What happens if my register entry is due for renewal after the new service has been implemented?**

We will continue to send correspondence to let you know your registration is due for renewal. This will include a description based on the nature of business template that you chose and full details of how to renew online, by direct debit or by telephone. If we hold an email address in the contact details the renewal reminder will be sent by email.

### **Further information**

We will provide more information on our website in good time to support the changes or you can telephone our helpline on 0303 123 1113 or 01625 545740 which is available between 9am and 5pm Monday to Friday to help with any questions.