

## Senior Leadership Team – minutes

23 June 2020

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

### Part 1

#### 1. Introductions and apologies

Apologies for absence were received from Louise Byers, Ian Hulme and Louise Bogle.

#### 2. Matters arising from the previous meeting

##### Minutes

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

##### Actions and decisions

Chris Braithwaite provided an update on the outstanding actions and highlighted that actions will now be tracked through Planner.

#### 3. Priority Projects

##### Discussion

James Dipple-Johnstone confirmed that he had not received any reports of any priority projects being off track.

#### 4. EU Withdrawal Updates

##### Discussion

Paula Hothersall provided an update on EU withdrawal work which included discussions with DCMS, maintaining strategic engagement with the EU outside of EDPB and development of a UK adequacy process.

##### Action

PICARD Board to ensure close links between data prospects and EU exit work.

#### 5. Grants Programme Update

##### Discussion

James Dipple-Johnstone declared a personal interest in this item as a graduate of Imperial College.

Rob McCombe joined the meeting for this agenda item

Lynne Currie confirmed that there had been 54 applications this year. Each application has been reviewed by internal and external panels and four applications are now being brought to the Senior Leadership Team for a final decision on funding. She recommended that three projects be selected.

Rob McCombe provided context on how the grants projects from previous phases are now linking into the work of the ICO.

Questions were raised relating to the ACT and Adtech projects. It was also highlighted that the the ICO would need to review the availability of internal expertise to work with each of the chosen projects.

It was agreed to delegate the authority to approve the projects to Simon McDougall, should one drop out after the questions have been asked and a review of internal resources has been carried out. Otherwise the projects should be brought back to SLT for approval.

#### Action

Rob McCombe to go back to the organisations with suggested questions and progress a decision in line with SLT's decision regarding delegating authority to Simon McDougall

## 6. Management Accounts

#### Discussion

Andrew Hubert confirmed that the budget was on track and the data protection fees are slightly ahead for the month of June year to date. A review is taking place to look at when we re-engage the Companies House programme.

It was confirmed that the risks initially anticipated relating to COVID19 have not materialised however these will be kept under review.

Andrew Hubert reported that a quarterly review of the budget would be held at end of June including a review of priority project spends and recruitment.

#### Action

Andrew Hubert to hold meetings with Directors regarding project spends and recruitment and provide an in depth review to the July meeting.

## 7. Risk and Opportunity Management

#### Discussion

Chris Braithwaite confirmed that the proposed changes outlined in the report were approved by the Audit Committee and highlighted that the Committee had asked that scores relating to the staff wellbeing risk and reputational risk were kept under review.

The Audit Committee had also requested a deep dive into ways of working/working differently post COVID-19 for the meeting in October. This report will be commissioned initially through Operation Volta.

The risk report was noted and approved by SLT.

## 8. Record of reports considered by email.

### Discussion

Chris Braithwaite reported that the proposal in the circulated report relating to Sandbox had been approved via email.

## 9. Any other business

### Discussion

There were no issues raised.

## 10. Accountability framework.

### Discussion

SLT received a presentation from Chris Taylor and Liz Archer setting out the progress with and current position of the Accountability Framework project. The Accountability Framework will help organisations to ensure that they have effective internal DP measures in place and demonstrate this.

SLT welcomed this as an excellent piece of work that was appropriate to take forward with some minor tweaks. SLT focused discussion on how the framework could be developed, particularly the importance of linking other ICO work to the framework (especially the guidance and regulatory action). Emily Keaney also commented it may be a particularly useful tool to aid with implementation of the AADC.

### Decision

SLT supported the roll out of the Accountability Framework, subject to consideration of whether the number of steps within it can be reduced from 11 to 10) and ensuring appropriate positioning in the context of the current regulatory landscape.

### Action

James Dipple-Johnstone to support Chris Taylor and Liz Archer in engagement for internal comms of the framework across the ICO, to maximise the links between framework and other ICO work.

## 11. Regulatory Sandbox

### Discussion

SLT considered a paper which set out proposals regarding a revised operating model for the next phase of the ICO's Regulatory Sandbox, which may be able to proceed earlier than expected.

SLT discussed the proposals in the paper and supported the proposal that the next phase of the Sandbox focus should have close links to the priority operations. However, SLT did note the potential resource challenges of this approach as those operation teams were already at stretched capacity. SLT agreed that it may be appropriate to use external resources if necessary.

SLT welcomed the excellent work of the Sandbox team to date. Liz Denham commented that the work of the ICO's Sandbox was of huge interest to Parliament and DCMS and it was work the Team should be very proud of.

### Decision

SLT supported the proposal in the report to move to a revised operating model for the next phase of the Sandbox. SLT agreed that this phase should be focused on issues linked to Operation LANDER and Operation GENA. SLT supported in principle options to outsource functions if necessary to ensure sufficient capacity.

## Attendance

### Members

Paul Arnold	Deputy CEO and Chief Operating Officer (for items 1-8)
James Dipple-Johnstone (Chair)	Chief Regulatory Officer
Emma Bate	Director of Legal Services (Regulatory Advice and Commercial) (for items 1-8)
Steve Eckersley	Director of Investigations
Mike Fitzgerald	Director of Digital, IT and Business Services
Suzanne Gordon	Director of Public Advice, FOI and Data Protection Complaints Service (for items 1-8)
Jen Green	Director of Corporate Communications
Andrew Hubert	Director of Resources (for items 1-8)
Paula Hothersall	Director of International (for items 1-8)
Emily Keaney	Director of Regulatory Strategy (Domestic)
Amanda Williams	Director of Regulatory Strategy (Parliament and Government Affairs)
Elizabeth Denham	Information Commissioner (for items 9-10)

Simon McDougall

Executive Director (Technology and Innovation (for items 9-10))

## Attendees

Lynne Currie

Head of Innovation (for items 1-8)

Ali Shah

Head of Technology (for items 1-4)

Robert McCombe

Senior Policy Officer (for item 5)

Liz Archer

(for item 9)

Chris Taylor

Head of Assurance (for items 9 and 10)

## Secretariat

Chris Braithwaite

Senior Corporate Governance Manager

Caroline Robinson

Corporate Governance Officer (for items 1-8)