

Annex 1 – Corporate Risk Register Updates since November 2020.

Risk number and title	Risk score as at Nov 2020	Risk score as at Nov 2021	Notes
R4: Capacity and Capability	20 (red)	20 (red)	The description of this risk has been amended slightly to add references to insufficient capability, knowledge and skills to the threat identified, to ensure that it covers the full range of capacity and capability risks.
R73: Compliance Culture	16 (red)	16 (red)	This was briefly reduced to 9 (amber) to reflect the deep dive conducted for Audit Committee into the lines of defence we have in place to ensure we deliver all of our statutory obligations. This work indicated that we had a good level of compliance and lines of defence to ensure future compliance. However, further assurance is needed to ensure that all of these compliance arrangements are operating as designed.
O3: Expectations gap	4 (red)	4 (red)	No significant changes.
R46: Financial resilience	16 (red)	12 (amber)	This risk typically reduces during Q2 and Q3 of financial years as there is more budget certainty, but increases during Q1 and Q4 to reflect the increased risk at these times. However, due to the unique budget conditions during 2020/21 due to the pandemic and the Companies House campaign, this risk was at a relatively high score as at November 2020. The score remained high until the end

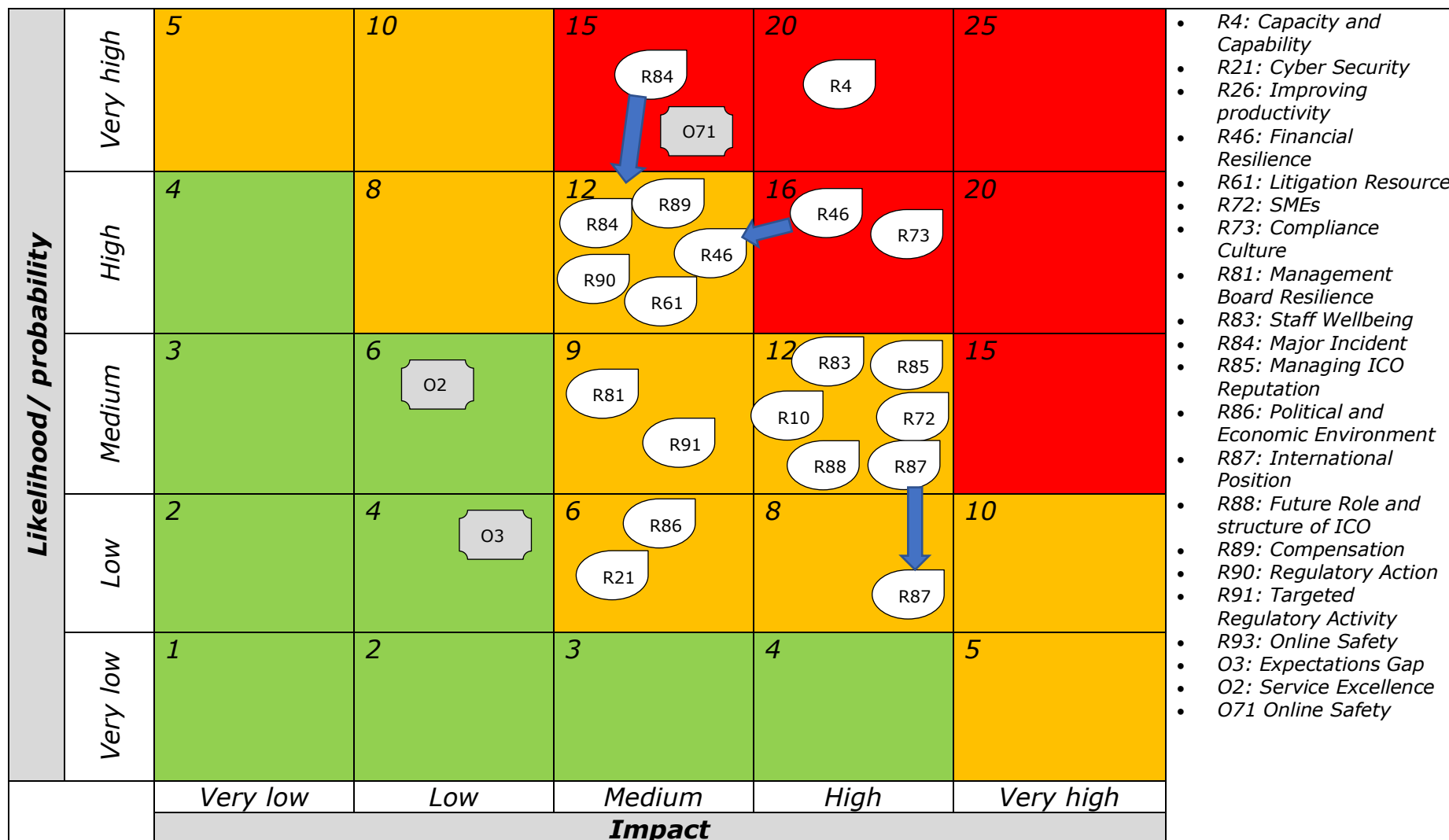
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			of Q2 2021/22, when we had more certainty on the deliverability of the 2021/22 budget.
R84: Major incident	15 (red)	12 (amber)	The score was reduced as the learning from the COVID-19 business continuity event has allowed us to improve business continuity practices and test our responses in a live environment. As such, the likelihood of a business continuity event has reduced.
R85: Managing ICO reputation	12 (amber)	12 (amber)	While the current score has not changed, the target score was increased from 4 to 6, to reflect the number of external variables that are beyond our control in this area.
R2: Service Excellence	12 (amber)	N/A	The risk was converted to an opportunity to reflect the progress with the Service Excellence programme, as the focus changed from risks of the changes to maximising exploiting the benefits of it. Opportunities are scored opposite to risks (a low score for an opportunity is bad and reflects the risk of opportunity not being exploited. Therefore the score is functionally unchanged. An update has been proposed to the December Risk and Governance Board (RGB) meeting to increase the opportunity score to 9 (amber) to reflect the delivery of planned actions within the Service Excellence programme.
O2: Service Excellence	N/A	6 (amber)	
R61: Litigation resource	12 (amber)	12 (amber)	No significant updates.
R72: SMEs	12 (amber)	12 (amber)	While the current score is unchanged, the target score has increased to reflect the increased income requirements from this sector associated with collection of DP Fees/ This was also retitled from SMOs (Small and medium sized

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			organisations) to SMEs (Small and medium sized enterprises) to reflect preferred phrasing.
R87: International position	12 (amber)	8 (amber)	The description of this risk was amended to reflect the end of the EU exit transition period, as that is no longer relevant context for the risk. The score was reduced to reflect UK adequacy being approved by the EU.
R29: Technology relevant regulator	12 (amber)	N/A	This risk was combined with R4 (Capacity and Capability)
R89: Compensation	12 (amber)	12 (amber)	The description of this risk was amended to explain that the impact is the public not seeing the ICO as a relevant regulator if it is not able to provide compensation.
R83: Staff wellbeing and welfare	12 (amber)	12 (amber)	The score of this risk increased from 12 to 16 (red) towards the end of 2020, to reflect the increased staff wellbeing concerns surrounding the COVID-19 pandemic. Following our most recent staff survey during autumn 2021, the score decreased to 12 to reflect evidenced improvements in staff wellbeing as the pandemic eases. This will be kept under close review.
R10: Statutory Codes	12 (amber)	N/A	Following the delivery of the Children's Code, it was agreed to remove this risk from the corporate register and replace it with risks for each of the individual Codes on relevant Directorate risk registers. This reflects that each of the Codes are at different stages and have different risks.
R88: Future role of the ICO	12 (amber)	12 (amber)	The description of this risk was updated slightly to include internally-driven restructures, which could have an impact on external perceptions of the ICO's role.

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R90: Regulatory Action	N/A	12 (amber)	<p>These risks were added during the year to ensure that there was appropriate reflection of our regulatory activities on the risk register, particularly in the context of achieving Goals 5 and 6 of the IRSP.</p> <p>A couple of amendments have been proposed to these risks, which will be considered by RGB in December.</p> <ul style="list-style-type: none"> - R90: Reduce current risk rating to 9, as the controls and methodologies that are currently in place provide added assurance on processes and accountability of decision making and thereby reduces the likelihood of the risk. Retitle this risk Regulatory Action and Activity. - R91: Remove from the corporate risk register and move this to the relevant Directorate Risk Registers.
R91: Targeted Regulatory Activity	N/A	9 (amber)	
R81: Management Board resilience	9 (amber)	9 (amber)	No significant changes. While this has been a key area of interest throughout the last year of Elizabeth Denham's term as Commissioner, the risk has been closely managed and mitigated.
R26: Improving productivity	6 (amber)	6 (amber)	No significant changes.
R92: ICO guidance	N/A	6 (amber)	This risk was created to replace R10 (Statutory Codes), and reflects the work that has been done to ensure that we produce high quality guidance that meets the expected standards from data controllers and Government.
R71: Online Harms	6 (amber)	N/A	

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O71: Online Safety	N/A	12 (amber)	The original R71 risk has moved between a risk and an opportunity over the last couple of years, depending on the key issues at the time. However, following the publication of the draft Online Harms Bill, this was divided into a risk (R93) (primarily relating to potential confusion about the ICO's regulatory role in this area) and an opportunity (O71) (primarily relating to building on our strong relationships with other regulators to deliver in this area). The draft Bill crystallised the risks in this area, so the score of the risk increased slightly. A proposal has been made to the December meeting of the RGB to remove O71 from the corporate risk register and manage this through Directorate risk registers.
R93: Online Safety	N/A	9 (amber)	
R21: Cyber Security	6 (amber)	6 (amber)	No significant changes.
R86: Political environment	6 (amber)	6 (amber)	No significant changes.
R76: Cyber-security regulation	3 (green)	N/A	This risk was combined with the new regulatory action risk (R90).

A heat map showing the scoring changes visually is provided on the next page.



Note: scores for opportunities are the inverse of scores for risks and should travel from low to high as the opportunity is exploited. So opportunities in the green section of the heat map are being exploited poorly and opportunities in the red section are being exploited well.