

Executive Team (ET) minutes

18 March 2024

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

1. Annual Internal Audit Plan

- 1.1. Lyn Bryant-Nichols and Darren Hall were welcomed to the meeting to present a report setting out the proposed internal audit plan for 2024/25, ahead of this being submitted to Audit and Risk Committee (ARC) for approval in April.
- 1.2. ET discussed the importance of audits of the implementation of new duties in the DPDI Bill and implementation of the regulatory risk review programme. ET agreed that it would be appropriate to include an audit of implementation of duties within the DPDI Bill as part of the 2025/26 internal audit plan.
- 1.3. ET discussed the indicative five-year audit plan and the importance of this continuing to be flexible to organisational needs while also ensuring adequate coverage of key risk areas. ET also commented that an audit of the effectiveness of the ICO's independence may be an appropriate audit to include in this plan.

Decision

- 1.4. ET agreed that the proposed audit plan appeared to be appropriate and deliverable and endorsed it to ARC for approval.
- 1.5. Following the meeting, the draft plan would be shared with ARC by email for review in principle, to allow planning of the Q1 audits to progress from the start of April.
- 2. Introductions and apologies
- 2.1. Apologies for absence were received from John Edwards and Jen Green. Louise Byers was welcomed to the meeting to attend in Jen Green's place.
- 3. Declarations of interests
- 3.1. No declarations of interests were made.
- 4. Matters arising from the previous meeting

Minutes

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

Actions from previous meetings

- 4.2. ET noted the update provided regarding actions from previous meetings.
- 5. Finance update
- 5.1. Louise Byers presented a report providing an update on the current financial position. ET was also informed that the cash flow risk which had been reported to the last meeting had now been fully mitigated.
- 5.2. ET particularly discussed the steps that were being taken to improve the accuracy of income and expenditure forecasts in future, particularly on people-based costs as the most significant element of expenditure. ET suggested potential other steps which could be taken.
- 5.3. ET also discussed the approach to approving currently uncommitted spend during 2024/25 and whether any further steps needed to be taken to address budget gaps for 2023/24.
- 5.4. ET also discussed the current progress with the review of the ICO's funding model. ET discussed any further steps which could be taken to mitigate risks relating to this review and to expedite the review as far as possible.
- 6. Corporate Risk Register update
- 6.1. Louise Byers presented a report introducing a discussion about updates to the Corporate Risk register.
- 6.2. ET discussed whether the definition for R01 Financial Resilience should be reviewed to reflect progress with the fee model review and lessons learned during the 2023/24 financial year, to ensure that it reflected risks in relation to income and expenditure.
 - ACTION: Louise Byers to ensure that the Financial Resilience risk is reviewed to ensure that it reflects risks in relation to income and expenditure. Due date: 22/4/24
- 6.3. ET commended the quality of papers and the excellent risk session which had been held with ET and SLT the previous week.

- 7. Risk management Orange Book compliance
- 7.1. ET noted a report updating ET on current compliance with the Orange Book Management of risk Principles and Concepts.
- 8. Audit and Risk Committee annual work programme
- 8.1. ET noted a report setting out the proposed ARC work programme, prior to this being presented to ARC in April.
- 9. Update on the work of Policy Board
- 9.1. ET noted a report providing ET with information of the recent work of the Policy Board.
- 10. Monthly cyber security dashboard
- 10.1. Rob Holtom discussed a report setting out the monthly cyber security dashboard.
- 10.2. ET received clarification that the completion of cyber security training was close to 100% for staff members who were able to complete the training. The staff who had not completed the training were largely currently out of the business on matters such as maternity leave or long-term sickness.
- 11. Any other business
- 11.1. There were no items of other business.
- 12. Key messages to staff
- 12.1. ET agreed that the key messages to staff from the meeting would be focused around the internal audit plan, finances, risk management and the high level of compliance with mandatory cyber security training.

ACTION: Laura Tomkinson to publish the key messages on Iris. Due date: 22/3/24

Attendance

Members

Angela Balakrishnan Executive Director of Strategic Communications

and Public Affairs

Claudia Berg General Counsel

Emily Keaney Deputy Commissioner (Regulatory Policy)
Louise Locke Executive Director, Customer Service

Paul Arnold MBE (Chair) Deputy Commissioner (Deputy CEO and Chief

Operating Officer)

Rob Holtom Executive Director, Digital, Data, Technology

(DDaT), Transformation and Delivery

Stephen Almond Executive Director, Regulatory Risk

Stephen Bonner Deputy Commissioner (Regulatory Supervision)

Attendees

Andrew Rimmer Private Secretary to John Edwards Catherine Heverin Private Secretary to Louise Locke

Darren Hall Government Internal Audit Agency (for item 1)

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 Laura Tomkinson Group Manager, Corporate Governance

Louise Byers Director of Risk and Governance

Lyn Bryant-Nichols Government Internal Audit Agency (for item 1)

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