

Audit and Risk Committee – for assurance

Meeting date: 17 October 2024

Time required: 5 minutes

Presenter: Louise Byers

1. Topic

- 1.1. Summary of ICO compliance including: reports of fraud, whistleblowing or insider trading; summary of single tender contracts awarded; and service complaint trends.

2. Objective of this report

- 2.1. To provide the Committee with an update on potential areas of concern raised during the most recent period.

3. Recommendation

- 3.1. That the Audit and Risk Committee notes the report.

4. Fraud, Whistleblowing and Insider Trading Reports

- 4.1. This report covers Quarters 1 and 2 of 2024/25 (1 April 2024 to 30 September 2024).

Fraud

- 4.2. No incidents of fraud were reported during this period.

Whistleblowing

- 4.3. One whistleblowing complaint was reported to People Services during this period. Although the complaint did not meet the public interest threshold of a whistleblowing complaint, it is being investigated as a potential disciplinary matter.
- 4.4. The Chair of the Audit Committee and internal auditors (GIAA) have received a number of complaints which were described by the sender as whistleblowing complaints but on further investigation have been reclassified. Most have been identified as service complaints, and have been passed on to the relevant ICO team for investigation. One has been identified as a staff misconduct allegation, and has been passed on to the Director of Strategy and Resources for investigation.

Insider trading

- 4.5. No incidents of insider trading were reported during this period.

5. Single tender contract awards

- 5.1. The Audit and Risk Committee receives a report at each of its meeting regarding any single tender contracts over £25k.
- 5.2. Since the last Audit and Risk Committee there have been no single Tender Award contracts over £25k awarded.

6. Service complaint trends

- 6.1. Annex 1 summarises details of actions taken in response to escalated service complaints. These are service complaints which have been sent directly to Management Board members rather than via the usual routes.

7. Publication decision

- 7.1. This report can be published internally and externally without redactions.

Author: Fiona Wilcock

Consultees: Paul Arnold, Ailsa Beaton, Stephen Bonner, Louise Byers, Sean Clayton, Andy Curry, Angela Donaldson, Suzanne Gordon, Mark Graves, Jen Green, Sally Anne Poole, Helen Raftery, Vikki West, Margaret Wilson-Savage, Lyn Bryant-Nichols (GIAA), Tommy Collins (GIAA), Sarah Self (GIAA), DSIT partnership team.

FOR ASSURANCE: PADPCS' escalated emails summary for July and August 2024

This report is to provide assurance to senior leaders and private office colleagues that emails forwarded to PADPCS during July and August were actioned appropriately.

Our changing approach

Over the summer, we spent some time reviewing how the PADPCS inbox team deal with escalated emails to ensure that we're adding value and that our approach is working for the customers we serve.

As part of our review, we observed that many escalated emails come from individuals raising a concern for the first time or whose correspondence simply needs to be added to ICE360 for their case handler to address. These emails do not need to be directed to the PO inbox team. Therefore, we have streamlined our processes to eliminate this unnecessary double handling.

From July onwards, these emails have been sent directly to icocasework@ico.org.uk for action, bypassing the PO inbox team. Emails that involve perceived wellbeing issues or dissatisfaction with how we've handled a complaint are still sent to the PO inbox team and, if necessary, copied to Suzanne Gordon and Helen Raftery. This change in approach has significantly impacted the figures for July and August, and moreover it ensures that customer correspondence is handled more swiftly.

Summer receipts

We received 51 emails from 21 customers through private office escalations in July and 21 emails from 17 customers in August. 13 customers sent a total of 43 emails in July and two customers sent a total of six emails (four and two) in August.

Emails from 12 customers were copied to Suzanne and Helen because they raised welfare concerns. Helen followed up all the emails that weren't already being dealt with to offer advice to the teams and ensure that they were being taken forward in the right way. This included creating briefing notes on the handling of two complaints and bringing forward plans to review and improve our ways of working with legal colleagues that we'll be discussing with senior colleagues in a meeting scheduled for October.

The action we took to deal with all of the escalated emails for this period is recorded in the table below.

The action we took on the other emails is detailed in the table below where you can also see the impact of the changes we have made to our processes. Action taken	Feb	Mar	Apr	May	Jun	Jul	Aug
Emails received	77	102	150	123	94	51	21
Forwarded to Public Advice and DP complaints or to Information Access for action	41	59	78	27	41	23	5
Copied correspondence No Further Action/Archived	16	17	5	60	25	16	9
Individuals who sent multiple emails	11	16	24	25	18	13	2
Copied correspondence sent to case and provision of advice was appropriate	1	0	0	0	0	0	0
Sent to Case Officer and manager for consideration/review	4	7	0	0	0	1	3
Processes exhausted – forwarded to case for final response	3	1	0	0	0		0
New case needed setting up	5	7	30	7	20	7 emails = 4 new cases	2 advice cases
Case chaser for existing case	1	1	0	0	0	0	0
Case to Group manager to be prioritised	1	0	0	0		0	0
HTC (How to complain)/Advice response sent by Inbox Lead Case Officer (LCO)	2	7	10	18	5	0	2
Follow up required from advice given					1	0	
MP correspondence actioned	1	0	0	0	0	0	0
Email for LCO reviewing case	1	0	0	1	0	0	1
No response required – email to case for retention only or archived	1	0	2	10	0	0	0

Forwarded to Andy Curry	0	3	0	0	0	0	0
NED required update	0	0	1	0	0	0	0
Referred to IH	0	0	0	0	1	0	0
Case already with legal – email forwarded	0	0	0	0	0	0	1
Referred to Op Howick- related to MP	0	0	0	0	1		0
Referred to Whistleblower inbox	0	0	0	0	0	3 emails same case	0
Waiting for case create and forwarding to BAS	0	0	0	0	0	1	0

Want to know more?

We're mindful that some of the emails you receive from our customers are really troubling. We're also mindful that you don't always get the full story and that you may want to reach out to us for further information. We're only too happy to help.

If you receive an email that is of concern and you want more detail about what's happened then please email Helen Raftery and Maureen White and we will get back to you.