

The Year Ahead: ICO DP Initiatives

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ICO Data Protection Strategy

- Building public confidence
- Minimising data protection *risk*
- Compliance with law not an end in itself – focus on *detriment* to individuals and society
- Being *selective to be effective*
- ‘Carrot and stick’ approach
- Maximising influence and impact



ICO Data Protection Strategy: Key Areas for 2009-10

- Unlawful trade in confidential personal information
- Public security and surveillance
- Increased information sharing
- Privacy by design
- Security and integrity of information
- Effective data protection supervision

ICO Privacy by Design Initiative

- Increasing amounts of personal information, increasing risks to individuals
- Technology used in innovative ways to exploit personal information but not always to protect it
- Technological and procedural safeguards have lagged behind
- Better to build in protection rather than bolt on

ICO Privacy By Design Work

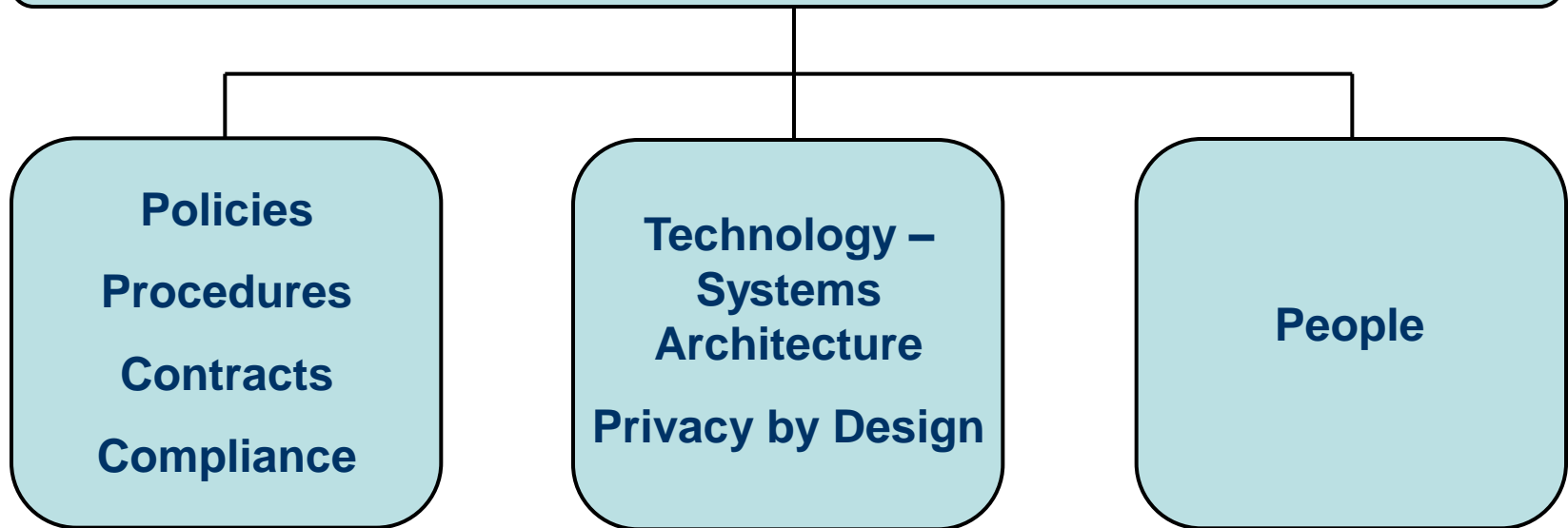
- Building in not bolting on
- Tools to help:
 - Privacy Impact Assessment Handbook
 - Explaining different forms of ID management
 - Promoting privacy enhancing technologies
 - Codes of practice/guidance
 - Information assurance
 - Information governance
- Privacy by Design report launched 26 November 2008

Privacy by Design Report

- Barriers
- Delivery
- Comparison with 'Security by Design'
- Engaging with executive level
- Planning-PIAs
- Sharing Personal Information
- Privacy Standards
- Privacy Enhancing Technologies
- Compliance and Regulation

Reputation and regulation matters for the Board

Governance and Accountability



The Personal Information Promise

- A chance to regain public trust and confidence by showing senior level commitment
- Not a regulatory compliance tool
- Opened for signature on European Data Protection Day (28 January 2009)
- PQs applauding those who have signed and questioning others who have not
- Media coverage

I **I (name and title),
on behalf of (name of organisation)
promise that we will:**
Promise

1. value the personal information entrusted to us and make sure we respect that trust;
2. go further than just the letter of the law when it comes to handling personal information, and adopt good practice standards;
3. consider and address the privacy risks first when we are planning to use or hold personal information in new ways, such as when introducing new systems;
4. be open with individuals about how we use their information and who we give it to;
5. make it easy for individuals to access and correct their personal information;
6. keep personal information to the minimum necessary and delete it when we no longer need it;
7. have effective safeguards in place to make sure personal information is kept securely and does not fall into the wrong hands;
8. provide training to staff who handle personal information and treat it as a disciplinary matter if they misuse or don't look after personal information properly;
9. put appropriate financial and human resources into looking after personal information to make sure we can live up to our promises; and
10. regularly check that we are living up to our promises and report on how we are doing.

Signed
Signed
(name and title)
Date



Security breaches reported Nov 07-Jul 09

	Disclosed in error	Lost Data/ Hardware	Lost in Transit	Non-secure Disposal	Stolen Data/ Hardware	Technical/ Procedural failure	Other	Total
Central Gov't	13	22	10		6	5		56
Local Gov't	19	14	4		25	7		69
NHS	14	50	10	7	67	10	4	162
Other	2				1	2	1	6
Other Public	26	20	10	2	18	6	3	85
Private	46	33	8	5	61	15	4	172
Third Sector	6	8	1		9	4		28
Total	126	147	43	14	187	49	12	578

Developments of note

- Coroners and Justice Bill
- Monetary penalties guidance (Criminal Justice and Immigration Act)
- Notification fee changes
- Privacy Notices Code
- PIA handbook v.2.0
- Simplifying EU Directive research report: May 09

A look further into the future

- Research project: Business case for investing in proactive privacy protection
- DP policy issue conference: Dec 09
- Another Commissioner's code of practice: Personal information on line Dec 09 consultation
- Report to Parliament on Surveillance: 2010
- Statutory information sharing code of practice?
- Privacy Incidents Lessons Learned: WARP?

Further Information

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