

# **Data Protection Officer Conference 2008**



Information Commissioner's Office

# **Data Protection Officer Conference 2008**

**Welcome**

**Richard Thomas**

**Information Commissioner**



# **Data Protection Officer Conference 2008**

**The ICO's Data Protection Strategy**

**David Smith**

**Deputy Information Commissioner**



# Why a Strategy?

- Maximise long term effectiveness in bringing about good practice
- Clarity for stakeholders
- Reference point for staff

# Our Vision

- A society where
  - information rights and responsibilities are respected by all
  - organisations inspire trust by collecting and using personal information responsibly, securely and fairly
  - people understand how their personal information is used, are aware of their rights and are confident in using them

# Key Concepts

- Minimising data protection risk
- Compliance with law not an end in itself
- Being selective to be effective
- Keeping freedom of choice
- Being influential
- Building public confidence

# Minimising Risk

- Individual harm
- Societal harm
- Setting priorities
- How serious and how likely?
- Can we make a difference?

# Being Effective

- Choosing how we intervene
- Working with others
- Data Protection Officers
- Our expectations of others
- Our international role



# Our Themes

- Unlawful trade in personal information
- Surveillance society
- Security
- Information sharing
- Law enforcement activity
- Effective DP supervision



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## Data Protection Challenges: Two Perspectives

***Kathy Ford***, Head of Corporate Information Management  
Department, Avon and Somerset Police

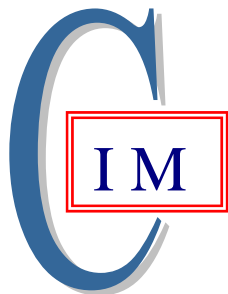
***Amanda Chandler***, Data Protection and Business Continuity  
Manager, Vodafone



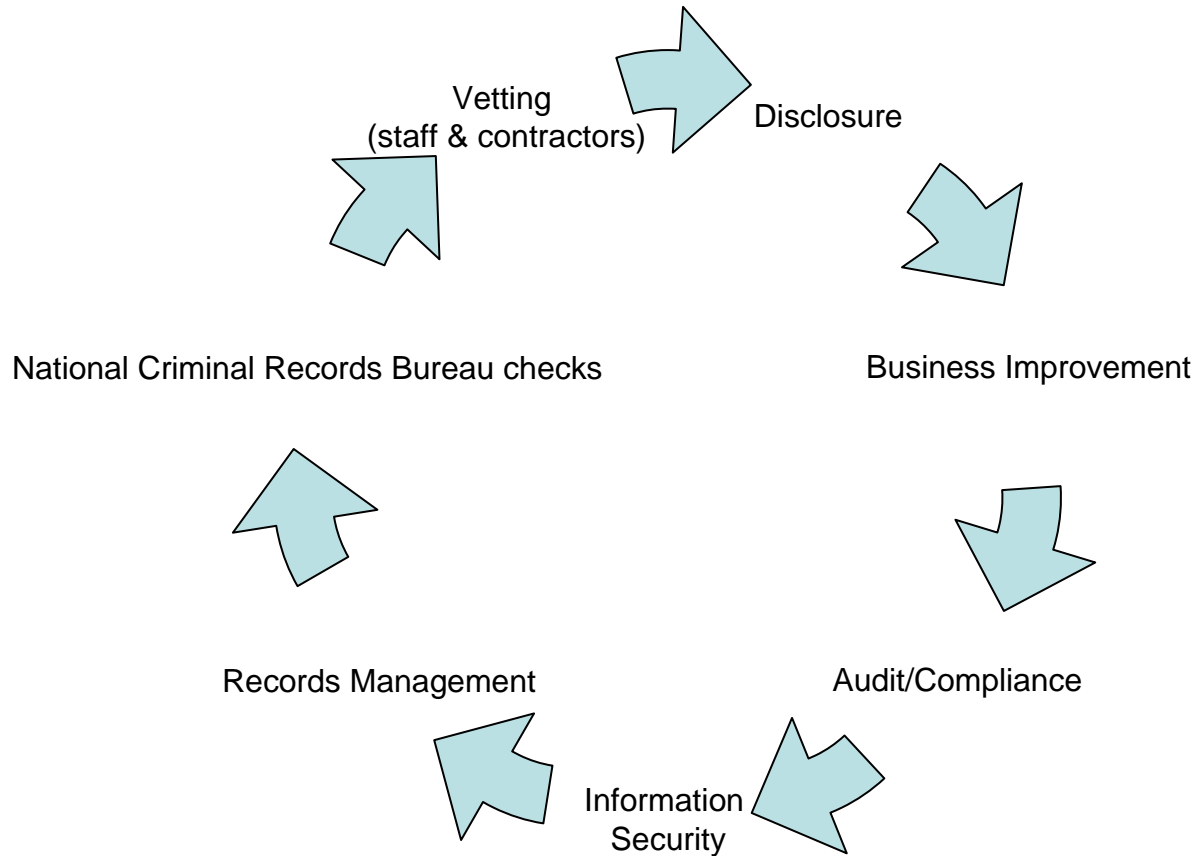
Kathy Ford

Head of Corporate Information  
Management Department (CIMD)

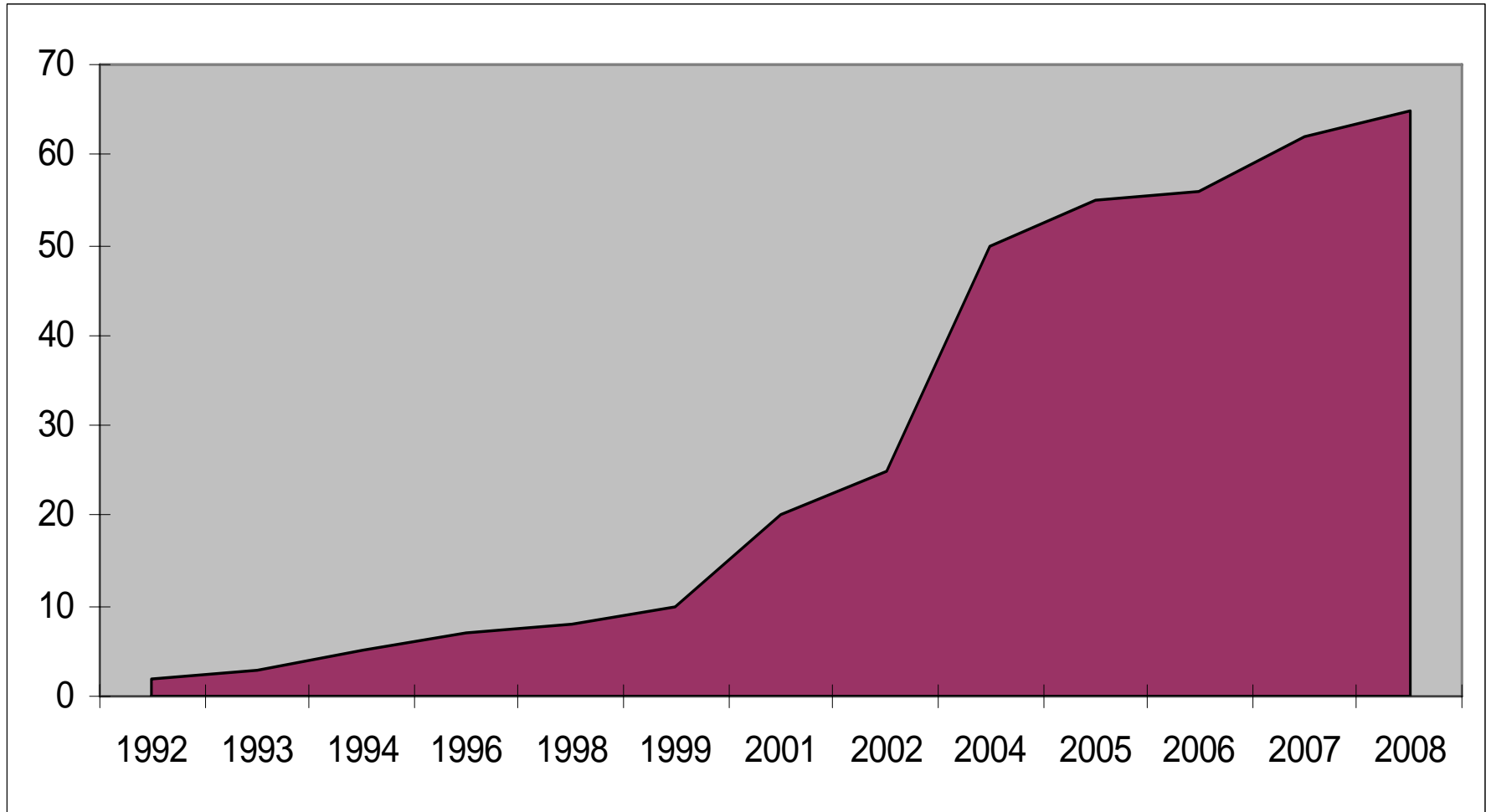
Avon and Somerset Constabulary



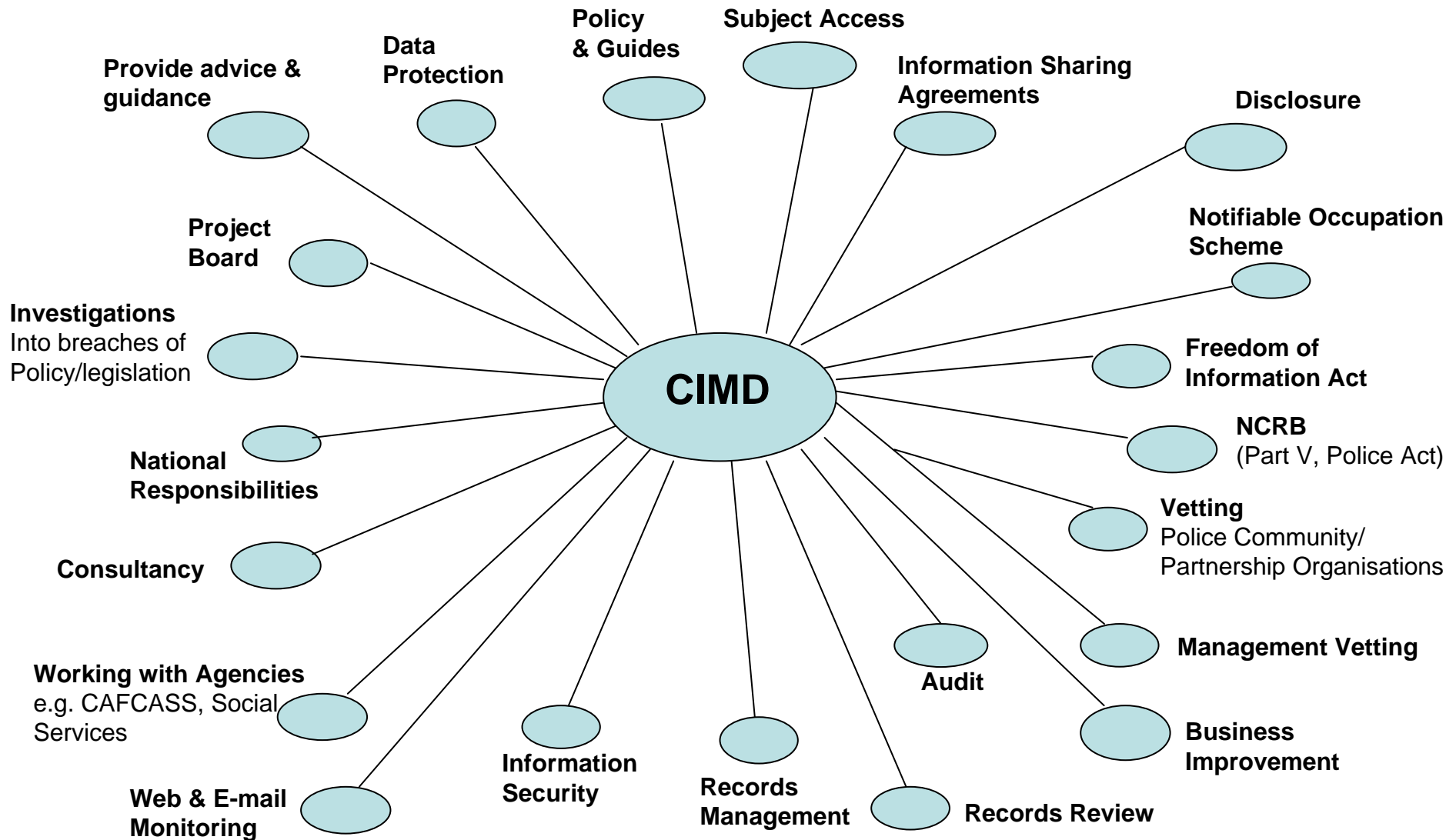
# Data Protection Integration



# 1992 - 2008



# CIMD Responsibilities 2008



# What does the future hold?





# Data Protection Challenges – a view from the private sector

Amanda Chandler

Data Protection and Business Continuity Manager

Vodafone Limited

March 2008



# Sectoral challenges – are there any differences?

## Public Sector

1. Government minister and/or other elected representatives who dictate policy.
2. Limited budget from tax revenue
3. Demands for value for money from taxpayers and regulatory bodies
4. Constituents or citizens demanding rights and/or choice.

## Private Sector

1. Global CEO who makes policy statements to market analysts.
2. Limited budget because we need to make a profit
3. Shareholders who demand value for money – a large dividend!
4. Customers who want choice and claim breach of rights when they do not get what they think they are entitled to.



# Historical Challenges

- Emphasis on acquiring customers
- Rapid growth
- Changing competitive environment
- Frenzied acquisition
- Large number of legacy systems



# Organisational Challenges

- Constant squeeze on spend
- Constant drive for efficiency
- Constant organisational change and re-structuring
- Frequent change in commercial strategy or business objectives
- Annual financial reporting – shareholders, market analysts



# Product and Services Challenges

- Increasingly sophisticated products and services
- Increasingly complicated tariff offerings
- Increasing convergence of mobile and non-mobile products and services



# What do customers care about?

- A great handset – for free!
- The lowest prices
- The best network coverage
- Confidentiality of the content of their communications
- But customers don't necessarily consider privacy or data protection unless or until something goes wrong!



# Creating an environment for compliance

- Don't bother telling people it is a legal requirement – they have heard it all before!
- Don't bother telling people that it is a market differentiator – our customers do not choose their mobile network operator on the basis of privacy.
- There is no business case for being the *best* at data protection – but there are sound business reasons for getting it right.



## So what can you do? Appeal to their commercial interests!

- Keeping data accurate and up to date – leads to quality management information, customer insight and modelling – leads to better business decisions about products and services, new tariffs etc.
- Getting rid of data when it is no longer required reduces the costs on servers, storage, migration to new systems. Speeds up system performance which improves both the customer and employee experience.
- Keeping data secure – keeps our CEO of the front pages of the newspapers and our data out of the hands of our competitors.
- Respecting marketing preferences – reduces the costs of sending expensive colourful marketing literature to people who put it straight in the bin.
- Carrying out simple verification checks in the customer service environment reduces the cost per call, and ensures that we are speaking to the right person about the right account thus avoiding mistakes and complaints which themselves attract costs.





# Be Business-like – speak to your business in language it can understand

- Have a compliance strategy – be realistic, it is impossible to be 100% compliant 100% of the time.
- Identify the risks that your business faces from a data protection point of view – contact centres, offshoring, outsourcing?
- What does your business have that the unscrupulous might want to get their hands on?
- What personal information do you have that your customers care about?
- Assess those risks – what would be the impact of the risk happening? What is the likelihood of that risk happening?
- Prioritise those risks
- Draw up a mitigating action plan for each risk with rough costs of implementation. Is there any low hanging fruit?
- Carry out a cost/benefit analysis – ie the cost of the risk materialising versus the cost of mitigating action.



# Data Protection Officer Conference 2008

Refreshments



# **Data Protection Officer Conference 2008**

**Workshop Session One: Security**

***“Data Protection and Information  
Security”***



# **Data Protection Officer Conference 2008**

**Feedback and Panel Q & A**



# Data Protection Officer Conference 2008

Lunch



# **Data Protection Officer Conference 2008**

**Welcome Back**

**Phil Jones**

**Assistant Information Commissioner**



# **Data Protection Officer Conference 2008**

## **The Challenges Ahead for Data Protection**

**Michael Wills MP**

**Minister of State, Ministry of Justice**



# Data Protection Officer Conference 2008

Refreshments





# **Data Protection Officer Conference 2008**

**Workshop Session Two: Transparency**

***“Using Fair Processing Effectively”***



# **Data Protection Officer Conference 2008**

**Feedback and Panel Q & A**



# **Data Protection Officer Conference 2008**

**Close and Final Thoughts**

**Phil Jones**

**Assistant Information Commissioner**

