

Bernard Jenkin
Chairman
Public Administration Select Committee
Committee Office
House of Commons
7 Millbank
London
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5 January 201

Dear Mr Jenkin

Thank you for your further letter of 21 December 2010 about the ICO's expenditure on communications.

As I mentioned in my letters of 29 November and 14 December, my reason for contacting you in the first place was concern about the oral evidence given at the PASC hearing of 23 November, which implied that the ICO had spent public money inappropriately on lobbying. I would like to emphasise again that the ICO does not undertake lobbying activity and has not paid for lobbying services or for public affairs consultancy. As evidence, I supplied the Committee on 14 December 2010 with information showing a breakdown of communications expenditure from 2004 to 2010, under eleven cost headings, with some examples and clarification.

I understand the Committee would now welcome further commentary on this expenditure.

As requested, I therefore enclose information under the cost headings previously provided, explaining the context of the expenditure and the reasons for it, and providing examples.

Details of ICO communications expenditure

As Commissioner, I have statutory duties under the Data Protection Act, the EU Data Protection Directive and The Freedom of Information Act to communicate to

organisations and members of the public. Both Acts require me to promote good practice to organisations, to disseminate information to the public and to lay a report annually before Parliament. The Data Protection Act also requires me to consult on and produce codes of practice. We do not charge for our services (other than the statutory notification fee which funds our data protection activities).

Cost headings	Further details
Annual report	Under the Data Protection and Freedom of Information Acts, the Commissioner is obliged to lay an annual report before Parliament. This report is produced for us by The Stationery Office and audited by the NAO. We produce a full and a summary version; 500 copies of each were printed last year. In the past we held a stakeholder event to launch the report, and to give people the chance to ask us questions. These events were typically attended by around 100 people, mostly from businesses, public bodies and civil society groups. In the future, we plan to reduce costs by not printing the full version of the report and possibly holding an electronic session rather than a launch event.
Campaigns	<p>The Commissioner has a statutory duty to disseminate information to the public about their rights and to organisations about their obligations. Such campaigns are planned communications activities with a particular focus and are conducted within a set timescale. They can vary in cost and size; most are bought via the COI. Campaign activity has greatly reduced since the government marketing freeze was introduced in 2010. Examples of previous campaigns include:</p> <ul style="list-style-type: none"> • The change in the data protection notification fees in 2009 meant we needed to inform 300,000+ organisations about the new fees regime. The year-long campaign involved writing and distributing a guide to the changes, updating web copy and online publications, updating hard copy publications and communicating the changes to staff. The ICO received positive comments from data controllers and the changeover went smoothly. • The ICO believes it is important to educate young people about data protection so that they learn good privacy habits early in their lives. In 2009 we ran a Student Ambassador Campaign, aimed at making students aware of the value of personal information and giving them tips to protect it. It operated in 15 universities, generated 46 campus partnerships with organisations such as banks and accommodation services, a facebook group with over 600 members and 31 pieces of media coverage reaching over 550,000 students. The cost was around £44,500. • To reach 12-16 year olds we ran a campaign in 2009 with Habbo Hotel, a virtual world for children with over 1.2 million UK members. The six-week campaign involved interactive opportunities to learn about personal information, including a bus

	<p>where ICO helpdesk staff answered questions, and a maze game in which participants answered questions on personal information. Over 34,000 children participated and there were over 125,000 unique views of the campaign page banner. The campaign cost around £17,000.</p> <ul style="list-style-type: none"> Following our campaign work, awareness among young people is high: in a survey last summer, 95% of 18-24 year olds were aware of the data protection right to see information held about them.
Media monitoring	To inform policy and complaints resolution work, the ICO monitors what is being said in the media about data protection and freedom of information, as well as about the ICO itself. We subscribe to a standard media monitoring service which checks online, press and broadcast coverage. We review suppliers regularly. The volume of media coverage determines the cost of the service. Over the last few years, there has been an enormous rise in media and public interest in information rights: media calls have doubled since 2005 and the number of media articles has nearly tripled.
Media relations	Most costs in this category are the Newspaper Licensing Authority and CLA licences, legally required to copy or monitor media coverage.
Conferences and seminars	The ICO runs an annual conference for data protection officers and another on data protection policy. The majority of costs in this category cover running these conferences, which are very popular and oversubscribed. Our 2011 data protection officer conference, for example, has spaces for 500 delegates, but over 750 have registered an interest so far. They offer an excellent opportunity to meet directly with those who have responsibility for implementing data protection in the workplace, to hear feedback and to offer education and information.
Design and print	The ICO does not have an in-house print or design department so this work is purchased through the COI. Our most popular publication is "Credit Explained", a data protection publication which explains personal information and how it can affect your credit record. Our publications are also available online but feedback from customers (individuals and organisations) is that they also want hard copies: we distribute around 200,000 publications a year.
Distribution	Most of this cost is a fulfilment house which mails out the publications ordered via our website and sends materials direct to those who notify with us, and provides stock control data. We distribute around 200,000 publications a year.
Management fees	The ICO has recently brought its press office in-house, at a saving of £190,000 a year, so this cost heading will greatly reduce in the future. Before it was run in-house, a press office service was supplied to us by Grayling, a PR agency, as it was previously considered essential to have a press office in London (the ICO is based in Cheshire). The press office runs a standard service, answering journalists' calls and raising awareness of data protection and freedom of information, for example by writing and sending news releases about ICO activity (largely

	regulatory action) and our e-newsletter (which has over 9,000 subscribers). We also spend around £16,000 a year, via the COI, on a standard parliamentary monitoring service, so we are kept informed about parliamentary activities and discussions regarding data protection, freedom of information and the ICO.
Online	The ICO has around 2 million visitors a year to its website. Costs in this heading cover the necessities of running a website, including development of the site, the content management system needed to run the site, renewal of domain (ie website) names, search engine optimisation (ensuring information on data protection and freedom of information is easily found), required security certificates and COI management fees.
Research	The ICO conducts research to better understand public and organisations and their awareness of and attitudes to data protection and freedom of information. The research is available on our website here http://www.ico.gov.uk/about_us/research.aspx . We run one annual piece of market research (the annual track) which surveys organisations and members of the public and informs our policy, complaints resolution and communications work. We do other pieces of research, such as customer satisfaction, staff survey and stakeholder perception, as budget allows.
Internal communications	The ICO has around 320 staff, most based in Wilmslow, Cheshire, with others in Wales, Scotland, Northern Ireland and London. The ICO's internal communications costs cover our intranet, in-house magazine, cascade system, briefings and staff events. This will be further reduced in the coming year, for example by doing electronic publications instead of print, and reducing or stopping staff events. Our staff survey shows ICO staff feel they are well informed.

I hope the Committee will find this information useful and trust this will now draw the matter to a close.

Yours sincerely
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