



GPA Global Privacy and Data Protection Awards 2021

Entry Form

To submit an entry to the GPA Global Privacy and Data Protection Awards please complete and email this form to secretariat@globalprivacyassembly.org no later than **14 June 2021**.

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2¹ applies.

1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection
Authority:

Information Commissioner's Office (ICO), UK

2. ELIGIBILITY

By submitting this entry, I confirm that (*please tick all boxes to confirm*):

- The Authority is a member of the Global Privacy Assembly
- The initiative described in this entry was undertaken since January 2020.
- I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat.

3. CATEGORIES

Please indicate which category you wish to enter.

*Please tick **one**; please use a separate form for each category you wish to enter:*

- Education and Public Awareness
- Accountability
- Dispute Resolution and Enforcement
- Innovation
- People's Choice

4. DESCRIPTION OF THE INITIATIVE

a. Please provide a brief summary of the initiative (*no more than 75 words*)

¹ [GPA Rules and Procedures](#), Rule 6.2 'Assembly documents':

Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures.

Accountability is key to minimising data protection risk and increasing public trust.

The ICO's Accountability Framework (the Framework) is a practical tool to support organisations to put in place appropriate, risk-based data protection measures, and to demonstrate their compliance.

It includes downloadable guidance, a self-assessment with a report, and an 'Accountability Tracker' to record progress.

The Framework can help to support any organisation, whether small or large, with their data protection obligations.

b. Please provide a full description of the initiative (no more than 350 words)

The Framework helps organisations to show that they are managing personal data risks appropriately and secure trust and confidence. This can help businesses to thrive and grow in a digital economy.

The Framework supports the foundations of an effective privacy management programme. It is designed to be flexible in keeping with the scalable nature of accountability. What is appropriate will vary depending on the circumstances, including the amount of personal data being handled, its sensitivity and the technology being used. The Framework isn't exhaustive and there is no 'one size fits all'. Organisations must still consider other guidance, use their own judgement and comply with all relevant legal requirements.

The Framework is divided into 10 key categories, for example 'Leadership and Oversight'. Selecting a category displays the ICO's key expectations and ways organisations could meet our expectations. We have included the ways we believe organisations would be most likely to meet our expectations based on our extensive supervisory experience.

The Framework is helpful to anybody with responsibilities for making sure their organisation complies with data protection. This could be senior management, the Data Protection Officer (DPO) or an individual with information management or information security responsibilities.

The Framework supports all organisations, and complements the guidance we already offer to support smaller organisations specifically.

The Framework can be used in different ways and for different purposes. For example, someone may use it to create a privacy programme from scratch, check existing practices or consider improvements.

The Framework consists of layered and downloadable web-based guidance. This links to helpful templates and resources, and encourages people to think about demonstrating the effectiveness of what they do to comply, rather than only in terms of documentation.

The Framework also includes a self-assessment that produces a 'traffic light' report to help DPOs (and other staff) engage with senior management. Where applicable, organisations decide whether to select that they are fully, partially or not meeting an expectation.

Finally, there is an 'Accountability Tracker' spreadsheet designed to help people to record and monitor their progress. It includes a dashboard that populates graphs to illustrate the data.

c. Please explain why you think the initiative deserves to be recognised by an award
(no more than 200 words)

Post GDPR, the Information Commissioner described accountability as 'the next big stage of data protection' and set out an ambitious plan to create the first ICO Accountability Framework to increase public trust and embed a positive culture.

Public consultation helped us to consider people's needs, practical solutions and overcome challenges. We explored what scope, structure and level of detail would be most helpful, which were challenging areas.

There was a very positive response to our initial plans but we also adapted in response to people's feedback. For example, people reported difficulties getting senior 'buy in' so the Framework clearly sets out benefits and includes reporting features.

We also hosted successful workshops with Field Fisher Law and business leaders at CIPL. Using feedback, we transformed our extensive supervisory experience into transparent, public-facing guidance that ultimately makes people's lives easier.

We are confident it is making a positive impact towards higher quality data protection standards. Representatives in government have told us that the Framework is 'one of the best they have seen' and DPO's tell us it is invaluable.

We are committed to the continued development of the Framework, and will shortly release further updates in response to public feedback.

d. Please include a photograph or image, if you wish *(This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided)*

Accountability Framework



- e. Please provide the most relevant link on the authority's website to the initiative, if applicable (*The website content does not need to be in English*)

[Accountability Framework | ICO](#)

- f. Please provide any other relevant links that help explain the initiative or its impact or success (*e.g. links to news reports or articles*):

[ICO Blog: Accountability Framework – Demonstrating your compliance](#)

ICO news and speeches

[Elizabeth Denham's speech at the DPPC on 5 May 2021](#)

"I hope you have seen me as a champion for your role, and telling the C suite that they need to know who their DPO is, and know how important they are.

I hope you have seen in the guidance we have produced that we are asking the question of ourselves: 'does this speak to the reality that data protection practitioners face?'.

And I know you will have seen the practical steps we've taken. In preparation for our DPO panel session later this morning I spoke with Helen from Tesco Bank. I was struck by a comment she made to me. She said the ICO's accountability framework resonated with her. It seems to be a tool that had been produced with her job as a DPO in mind. I heard that as very high praise for the ICO!"

[Five things we learned from DPPC 2021](#) – 6 May 2021

"The popular 'Accountability in Practice' seminar gave practical advice on achieving that balance, with Elizabeth Archer, ICO Principal Policy Adviser, speaking about the importance of "creating and embedding a positive data protection culture." She explained how the ICO's accountability framework can help organisations think about the risks around data processing, and how to mitigate them".

[Accountability: How the ICO sees it](#) – Field Fisher Law – 10 October 2020

[How the ICO's Accountability Framework could help your business](#) – Data Protection Network – November 2020

[DPO Centre ICO Accountability Framework](#) – November 2020

"Collectively, the ten sections of the Accountability Framework should provide organisations with a clear road map to demonstrating compliance with the GDPR as a whole, as well as specifically the Accountability principle. Although it must be reiterated that the entire contents of this list is neither exhaustive nor essential, the Framework, along with its accompanying self- assessment tool and accountability tracker, is likely to be invaluable for many organisations".

[Comments by the Centre for Policy Leadership](#) – 30 October 2020

"Overall, CIPL believes that the ICO accountability toolkit is excellent and practical to organisations".