



## GPA Global Privacy and Data Protection Awards 2024

### 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](mailto:secretariat@globalprivacyassembly.org) **no later than 17 June 2024**.

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 6.2<sup>1</sup> applies.

#### 1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection Authority:	Information Commissioner's Office	
Person completing this form:	Gemal	Mekki
	<i>First name</i>	<i>Last name</i>
Job title:	Principal Economist	
Email address:	Gemal.mekki@ico.org.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 2022.
- 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

<sup>1</sup> [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.

## 4. DESCRIPTION OF THE INITIATIVE

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

As an evidence-based regulator, one of the strongest signals we can send on accountability, is to **hold ourselves accountable** for our actions. Over the past two years, we have been developing the capabilities to demonstrate the **impact** of our regulatory activities and show that:

- A) we understand the burdens placed on organisations; and
- B) what we do matters and have a net positive impact on society.

This empowers others to take ownership and demonstrate accountability.

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

Over the last two years we have introduced a formal approach to impact, ensuring our work drives change and improves the accountability of organisations. Our approach hinges on a suite of frameworks to implement impact thinking throughout the policy and decision-making cycle. It ensures we learn from our mistakes, celebrate our successes and hold ourselves accountable. It empowers others to transition their accountability measures from law to practice. It also provides a formal mechanism for reporting and evidencing this. Our approach includes the introduction of new frameworks and enhancement of existing frameworks:

- [Impact Assessment Framework](#): an overview and strong signal of our commitment to accountability. Impact assessments are a useful tool for assessing and recording the impacts of our activities but the framework has much wider implications for our development of policy and other initiatives. The principles within the framework have spread into all areas of our work.
- [Regulatory Policy Methodology](#): framework for evidence-based decision-making in policy development with accountability built into each step.
- [Taxonomy of Data Protection Harms](#): for formalising and communicating our understanding of the types of harms that can come from poor compliance and accountability.
- [Consultation Policy](#): our policy on the use of consultation to gather the views of others.
- Ex-post Impact Framework (currently under development): framework for assessing initiatives that have already taken place.

For every significant proposal, impacts are considered and our [impact assessments and evaluations](#) are published on our website. This can include:

- **Theory of change**: a comprehensive description and illustration of how and why a desired change is expected to happen in a particular context;
- **Ex-ante impact assessment**: an assessment of the potential consequences (positive and negative) of a future course of action, the context surrounding it, and the potential options available to us; and
- **Ex-post impact assessment**: an evaluation or review of the context, process and impact of a course of action that has already occurred with a view to providing accountability, transparency, and lessons for the future.

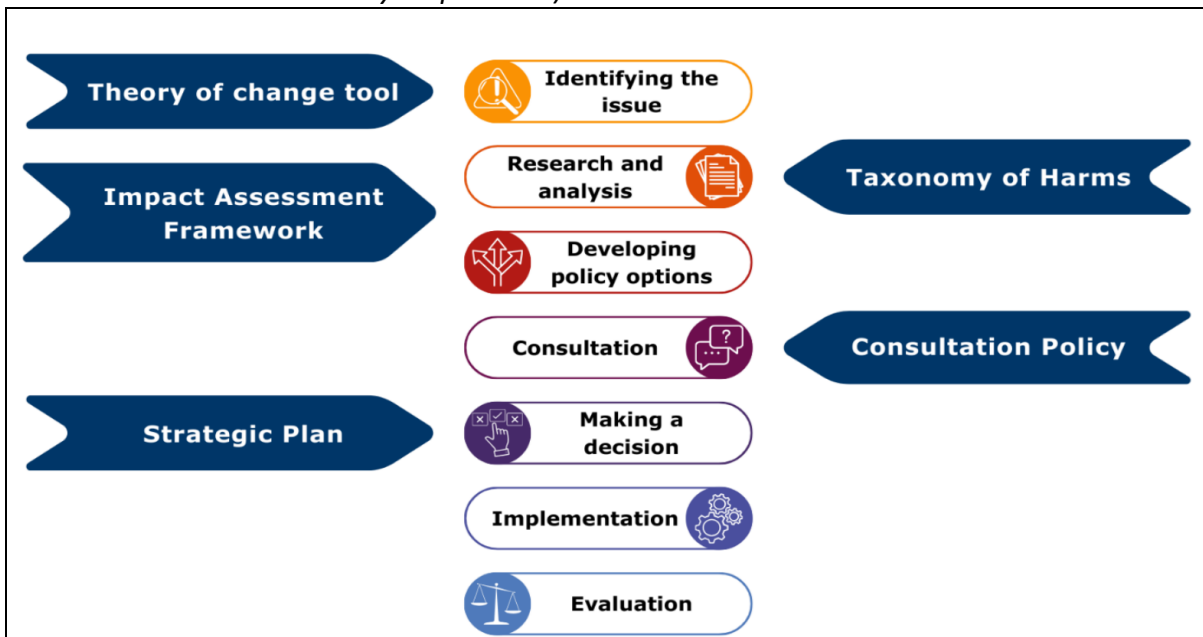
The approach has been well-received and has enhanced the dialogue with those we regulate as well as other regulators, civil society organisations, and government.

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

Our work on impacts provides an innovative and ambitious approach to improving accountability. It allows us to reach stakeholders on a topic that they care about (the impacts on them) and are much more likely to engage on. Demonstrating our own accountability is the most important step in helping to transition this more implicit requirement from law into practice and will allow us to speak much more confidently on this issue with our stakeholders.

As far as we are aware, this approach is the first of its kind (and hopefully the first of many) developed by a data protection authority. We hope that this and our future work in this area, can serve as a useful blueprint for others and look forward to working with other authorities to help them take it forwards. Our work on theory of change, impact assessments and evaluations, is also best-in-class. We have already had conversation with other data protection authorities to support them in implementing similar initiatives. Our approach targets one of the poorest understood principles of data protection and aims for as broad an audience as possible. Recognising ambitious and innovative initiatives encourages others to push boundaries and think outside of the box.

**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)**



**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)**

[Measuring Our Impact | 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):**

[Impact Assessment Framework](#)

[ICO Consultation Policy](#)

[Policy Methodology](#)

[Impact Assessments and Evaluations](#)

[Data Protection Harms](#)