

# ODPA Communications Strategy (2019 – 2022)

1. **Statement of purpose and overall aim**
2. **How this strategy fits into ODPA *Strategic Plan (2019-2022)***
3. **Key messages, motto, identity, transparency, community and global context**
  - 3.1: Empowers individuals and protects their rights
  - 3.2: Promotes excellence in data protection
  - 3.3: Supports the data economy to embrace innovation
  - 3.4: Regulates data protection legislation through an ethics-based approach
  - 3.5: Our motto
  - 3.6: Our identity
  - 3.7: Our commitment to maximum transparency
  - 3.8: Our community and global context
4. **Our communications objectives**
  - 4.1: *Public awareness*
  - 4.2: *Promotion of the Bailiwick*
  - 4.3: *Awareness of law*
  - 4.4: *Protection of reputation*
5. **Communication style: words, focus, images, font, colour and logo use**
  - 5.1: *Words*
  - 5.2: *Focus*
  - 5.3: *Images*
  - 5.4: *Font and colour*
  - 5.5: *Logo use*
6. **Communication channels**
  - 6.1: Website
  - 6.2: *Newsletter*
  - 6.3: *PR*
  - 6.4: *Public statements*
  - 6.5: *Annual report*
  - 6.6: *Official guidance*
  - 6.7: *Events*
  - 6.8: *Social media*
  - 6.9: *Podcasts*
  - 6.10: *Schools programme*
7. **Work Plan**
8. **Measuring the success of this strategy**

## ODPA Communications Strategy

### 1. Statement of purpose

This document details how we plan to communicate our key messages. It covers the period 2019 – 2022, and will be reviewed as soon as practical after December of each year.

#### This communications strategy defines:

- what our key messages are;
- what our communications objectives are;
- how we plan to spread those messages to our various target audiences;
- and how we plan to measure the success of the strategy.

#### The overall aim of the strategy is:

*To promote the Bailiwick's position as a jurisdiction with excellent and innovative data protection standards which retains its 'adequacy' recognition from the EU.*

### 2. How this strategy fits into ODPa Strategic Plan (2019-2022)

Our [Strategic Plan \(2019-2022\)](#) details the following key areas of regulatory activity in relation to data harms:

1. Predict
2. Prevent
3. Detect
4. Enforce

This communications strategy largely falls into the 'predict' and 'prevent' activities. This strategy details how we focus on *predicting* where the potential for harm is, then raise awareness and empower citizens to try to *prevent* harms from happening in the first place.

The reason for this focus is that the more 'predict & prevent' activities a regulator can do the less they will need to 'detect & enforce' when harms have occurred. This is especially true in relation to data harms, as often they simply cannot be undone.

That said, 'detect & enforce' activities also have a huge part to play in this strategy, as they feed into the regular self-reported breach statistics we proactively publish every two months, and the aim of our Public Statements (see 6.4 below) is to allow lessons to be learned as widely as possible.

So, broadly speaking, this communications strategy details how we proactively engage the regulated community in their responsibilities to look after Bailiwick citizens' data well (predict & prevent), and show them the consequences of when things go wrong (detect & enforce).

### 3. Our key messages

The Office of the Data Protection Authority:

- 3.1: Empowers individuals and **protects their rights**
- 3.2: Promotes **excellence** in data protection
- 3.3: Supports the data economy to **embrace innovation**
- 3.4: Regulates data protection legislation through an **ethics-based** approach

3.5: **Our office motto** is: *Excellence through ethics*

3.6: **Our identity**: we are the Office of the Data Protection Authority. We can also use the acronym 'ODPA'. Our board is The Data Protection Authority or The Authority. We do not use the term 'Data Protection Office' to refer to ourselves. The **public face** of the ODPA is our Commissioner and Deputy Commissioner. Our previous name was The Office of the Data Protection Commissioner, we stopped using this name in January 2019.

3.7: **Our commitment to maximum transparency**: we will operate in the most transparent way possible for us. We commit to publishing regular statistics and information about our activities, as well as governance details (for example: approved board minutes, code of conduct, register of board members' interests, and the memorandum of understanding with any relevant other bodies).

3.8: **Our community and global context**: we recognise that regulating a small jurisdiction such as the Bailiwick of Guernsey brings opportunities as well as challenges. We stand alongside the citizens whose rights we are here to protect, putting them at the heart of our activity. We value open, honest, and constructive interactions with the organisations we regulate, our local journalists, our politicians, and civil servants. We see beyond the Bailiwick to the global ecosystem our citizens exist in and we seek to elevate the conversation around data protection. We strive to uphold the islands' reputation on the international stage as having high standards of: ethics, transparency, innovation and excellence.

#### 4. Our communications objectives:

##### 4.1: *Public awareness*

To **promote public awareness of risks, rules, safeguards and rights** in relation to processing of personal information, with specific focus on supporting children/young people's awareness of rights over their data.

##### 4.2: *Promotion of the Bailiwick*

To promote the Bailiwick's position as a jurisdiction with **excellent and innovative data protection standards** which retains its 'adequacy' recognition from the EU

##### 4.3: *Awareness of law*

To **promote awareness of the legal duties** placed on organisations who are controlling or processing personal information.

##### 4.4: *Protection of reputation*

To **protect the ODPA / Data Protection Authority's reputation** by communicating in-line with our Strategic Plan (2019-2022).

#### 5. Communication style: words, focus, images, font, colour and logo use

##### 5.1: **Words**

We will communicate clearly and concisely, using plain English at all times, for all audiences. If we use technical terms we will explain them.

### **5.2: Focus**

Where appropriate we use stories to bridge the gap that may exist between people's awareness of data protection issues and reality. These stories reveal how people are impacted by data misuse, and communicate the complexity of data harms.

### **5.3: Images**

When we use images in our communication activities we use only high quality photography and/or graphics. Our preferred visual language is line drawn graphics.

### **5.4: Font and colour**

Our preferred font is Open Sans (black text). We use this in our official documents and presentations. We mainly use these colours: green, blue, black, and dark teal.

### **5.5: Logo use**

We use our logo and accompanying motto on all official documents, and on all other related materials.

## **6. Communication channels**

We use a variety of channels to share our key messages, these will include:

### **6.1: Website**

We use our website to house all public-facing information. We regularly update content across the site (e.g. blog / news items, podcasts, case studies, public statements, official guidance, policy statements, statistics updates, events, ODPA governance materials).

We endeavour to keep our website as user-friendly, useful, and secure as possible.

During the period covered by this strategy we completed 'The Fandango Project' – an internal ODPA project which built a fit-for-purpose technology stack (from public-facing website through to back-office systems) to help us work quickly and effectively. This project was initially scoped in Quarter 4 2018, it received States of Guernsey funding approval in March 2020, and was completed in December 2020.

### **6.2: Newsletter**

We publish a monthly newsletter which anyone can sign up to receive via our website. This includes: our own news items; comment on data protection issues that may be in the news; overview of specific issues; profiles of staff; profiles of data protection officers at local organisations; upcoming events; guidance; success stories etc. We also publish a quarterly newsletter specifically about Project Bijou (see section 6.7 below for more info).

### **6.3: PR**

We work collaboratively with all local media to communicate our key messages to the general public and local organisations.

We also, where appropriate, share information with local professional bodies so that they can pass on relevant information to their membership.

We produce regular updates on our statistics (e.g. self-reported breaches) - these are published on our website and released to all local media.

We contribute to articles in local and off-island publications/platforms/professional bodies as required and where appropriate.

#### **6.4: Public statements**

We issue The Data Protection Authority's public statements as necessary in accordance with the specific conditions outlined in section 64 of *The Data Protection (Bailiwick of Guernsey) Law, 2017*.

Public statements are issued in accordance with the ODPa 'Regulatory Activity Disclosure Policy'. They may relate to specific data breaches, complaints, investigations, inquiries, recommendations, determinations, or sanctions/enforcement action.

#### **6.5: Annual report**

We publish the Data Protection Authority's annual report in accordance with Schedule 6 (section 13) of the Law.

These reports include details of: numbers of complaints received; numbers of investigations and inquiries; an anonymous summary of any sanctions imposed under section 73; anonymised examples of complaints received and their outcome.

These reports also detail whether the Authority thinks it is necessary to change any part of the Law to make it easier to achieve its aim, and include general commentary on data protection matters relevant to the period.

#### **6.6: Official guidance**

We publish non-legally binding opinions and/or guidance in accordance with section 63 of the Law – of our own initiative or as requested by any person, where we deem appropriate.

We may produce these in relation to: any data protection issue; compliance with the Law; or how the Authority plans to perform its functions.

For the benefit of members of our regulated community who operate in other jurisdictions we will, where we deem appropriate, signpost to other data protection authorities' official guidance on topics that are substantially similar to our local law to conserve resources and to achieve consistency.

#### **6.7: Events**

We run an events programme<sup>1</sup> with the aim of effecting cultural change by:

- **being accessible** to local organisations and citizens of all ages
- **improving compliance** by building awareness of topical issues in data protection
- **encouraging innovation and excellence** in data protection practices
- **exploring official guidance** with the regulated community
- **gathering feedback** from local industry and individuals

Since July 2019 we have been using a device in our events programme known as 'Project Bijou', where we invite attendees to proactively share what they have learned with their colleagues. This sharing could take any form, from conversations, to people putting on their own 'in-house' session to cover the same ground as our event. The key feature is that it is based on *trusted*

---

<sup>1</sup> Where appropriate we upload videos to the ODPa YouTube channel (created in March 2020).

*human-to-human connection*. The thinking behind this is that people who choose to come to our events are better-placed to gently, and positively influence the culture (and individuals' behaviour) within their workplaces than we, as the regulator, are.

Asking people within the regulated community to share good-quality, useful, human-focused information with each other, within the construct of Project Bijou, will hopefully lead to: more-informed ethical decision-making; more organisations focusing on human values, which in turn will lead to better protection of people's rights, which is the object *The Data Protection (Bailiwick of Guernsey) Law, 2017* seeks to achieve.

Attendance at our events programme should not be considered to replace formal staff training as the ODPA does not have a training remit. Our events programme should be considered in the context of section 61 of the Law which outlines our duty to *raise public awareness* of rights and to *promote awareness* of data controllers/processors' legal duties.

Our events are non-profit making.

The format of our events programme is varied, e.g. workshops, forums, 1-2-1 surgeries with organisations/individuals, talks from invited speakers, live-streamed webinars, lunch & learn informal Q&As, conferences.

Each year we run a number of key events that form the core of a 'rolling programme'. These core events repeat, and are punctuated with ad hoc events on specific, timely subjects.

Event topics and themes include: data ethics; the role of data in society; impact of data mis-use; building a data protection culture; the role of the data protection officer; how to respond to subject access requests; exploring new official guidance; public consultations; breach reporting; international developments; etc.

We run, and/or attend, specific events aimed at raising awareness of individual rights in particular groups (e.g. attendance at Digital ACE event and running awareness sessions in schools to reach local school-age children).

We promote our events programme via our website, social media, e-newsletter, press releases, and relevant professional organisations.

All ODPA staff are encouraged to prioritise their involvement in our events, either directly as speakers or indirectly as observers. Our staff members also undertake speaking engagements and will consider all invitations to speak at external events in line with our internal policy.

### **6.8: Social media**

We use a single platform – *LinkedIn*, as we feel it is the most appropriate place for us to be and makes best use of our limited resources.

We have taken a deliberate decision not to use other platforms at this time (such as Facebook, Twitter, Instagram). We keep this position under constant review. This decision was taken as we are choosing to focus our time, effort and attention in pursuing meaningful public engagement via our in-person engagement activities (such as events, drop-ins, speaking engagements, and schools programme). We believe our regulated community is better served by us focusing on giving them direct access to our expertise and guidance, rather than us spending time managing informal online engagement via multiple social media platforms.

Due to the informal nature of engagement and interaction on social media, we believe we can only operate effectively if we continue to serve our regulated community via our website and email routes.

We use *LinkedIn* to regularly share information, predominantly in the form of short text and image-based updates that link back to fuller content on our website.

Examples of content we share include: news items, details of upcoming events, public statements, new guidance/policies, vacancies etc.

Where appropriate the ODPA posts third-party content that serves the purpose of reinforcing our key messages or raising awareness of issues relevant to our jurisdiction.

We trust the good judgement of ODPA staff and board members and we encourage them to share ODPA content with their network as they deem appropriate. ODPA staff members and board members are encouraged to use their own discretion when posting their own content as individuals, as well as when they comment/like others' content (on *LinkedIn*, or other platforms).

### **6.9: Podcast**

We produce regular, short podcasts on our channel 'Data Protection: tea break' which aims to give listeners an accessible, informative, thought-provoking, and hopefully entertaining insight to a broad range of topics relevant to data protection. We use SoundCloud and Apple to host the podcasts and share them via our newsletter, social media and website. The podcasts normally take the form of at least two ODPA staff members talking about a given topic. Where appropriate, and where possible we involve people from outside the ODPA to talk on specific topics.

### **6.10: Schools Programme**

In April 2019 we started developing a programme of sessions to raise school-age children's awareness of their own rights under data protection legislation, and to engage them in the responsibilities we all have to treat personal data well. This activity forms part of our commitment and statutory obligation to *promote public awareness of data protection risks, rules, rights and safeguards, particularly in relation to children*. Building children's awareness, via a programme of sessions delivered in all Bailiwick schools, has the following benefits:

1. A well-informed young person is less likely to fall victim to harms that may arise if their personal data is used or mis-used by others.
2. A well-informed young person may share their new awareness with adults in their lives, so the message is spread wider.
3. When these engaged and informed individuals enter the workforce their awareness, attitudes, and actions could serve to strengthen overall compliance.

The schools programme formally commenced in November 2020, following successful completion of focus groups and development of appropriate resources.

## **7. Work plan**

We maintain an internal work plan to detail all activities delivered under this strategy. This is used as the basis for reporting to the Authority.

## **8. Measuring the success of this strategy**

We define this strategy's success in relation to whether we achieve its overall aim – *To promote the Bailiwick's position as a jurisdiction with excellent and innovative data protection standards which retains its 'Adequacy' recognition from the EU.*

Success measures for this aim include the existence of:

1. A **functioning law** that is achieving its aim of protecting individuals' rights and allowing for free movement of personal data.
2. **Effective governance** (as defined by the behaviour of our Chairman and board, and associated policies.)
3. **Documented public engagement activity** delivered in-line with this communications strategy.

---

If you have any questions about this document please contact [communications@odpa.gg](mailto:communications@odpa.gg)