

FSA 19/10/10

Time & Security Assessor -

JB str - Says must be able to  
bring things into the table

## Privacy and security: an impossible dream?

Jonathan Bamford  
Head of Strategic Liaison



### The role of the ICO

- Enforce and regulate
  - Freedom of Information Act
  - Data Protection Act
  - Environmental Information Regulations
  - Privacy and Electronic Communications Regulations
- Provide information to individuals and organisations
- Adjudicate on complaints
- Promote good practice

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### Public social concerns

Preventing crime	96%
Protecting personal information	94%
Unemployment	93%
The NHS	90%
National security	90%
Environmental issues	90%
Equal rights for everyone	89%
Improving education standards	89%

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- Now 25 years seen public is  
aware of how vulnerable position is  
to data and security issues how to  
is not an obvious

- Now in 25 years seen public  
protection and data security  
measures for what will do more  
to protect public services - security

- Now have seen increasing government  
public privacy and security policy  
both databases state at school for  
transportation work programme.

And seen NHS being data  
also contact public - Veterans  
& Barry Rogers, Minister  
CIC, Minister of MOD -  
- All arguments to do with why  
Security being needed /  
Control in security.

Don't believe it is a zero  
sum where can only have  
privacy without security  
or security without privacy  
100 to achieve 2 - can population

Both are public concerns  
possible to address in increasing  
ways for competitive esp.

And then

## Surveillance / dataveillance

- Electronic footprints
- Transactions tracked, interactions identified, preferences profiled
- Retained, shared, disseminated
- Increasingly detailed and potentially intrusive picture of our lives

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Not just done down reports  
of surveillance but we have  
ICT review that says we  
are moving use of mobile phone

Each time more use of mobile phone  
data, but to a certain extent  
all being electronic footprints.

- grows up in computerized ways

Agreed that such data  
made available to police  
crime & national security.

- correctly the data is being sent  
sometimes secretly

## Database state?

- ContactPoint
- National DNA Database
- Communications data-interception modernisation programme
- National ANPR data centre
- National Identity Register
- E-Borders programme

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Solving crime (CT)

Also puts data in one - can put pet  
benefits

## Private sector dataveillance?

- On line services
- Communication services
- Behavioural advertising
- Loyalty cards
- Financial data
- Social networking
- ID scanning

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How do we

## What lies ahead?

- Government's programme on openness, transparency, privacy and information rights
- Transposition of e-Privacy directive into UK law
- Information sharing code of practice
- Report to Parliament on the state of surveillance
- Report to Parliament on operation of ELNOR suspect financial transaction database
- Develop the Personal Information Promise
- Possible amendment to DP legislative framework in UK and EU

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- No ones given up on  
privacy in the name of  
licensed safety -

1.

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Societies and privacy are impossible  
choices - not if we need

to decide what what it achieves  
or whether your secrets threaten - is it  
proportionate to and what is it for?  
Need to look at privacy policy, what  
data POTs - to determine where  
data

Need to ensure that  
we don't change the way  
freedom in societies that  
we are trying to protect

T/Y

\* We need to think about what society  
achieves, is it just society itself or  
is there a pressing need for society to protect  
information with privacy

\* We need to look at privacy policy, what  
POTs that determine where for business etc

\* Need to ensure that data is not under  
undermined the very fundamental freedom  
in societies that we are trying to  
protect. 15/10

### No single silver bullet!

- Understanding responsibilities
- Practical tools to help compliance
- Effective enforcement
- Privacy by Design
- Governance
- Organisational culture

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No SSB - to catch before all data developments

Orgs need to understand regulations and internal responsibilities guided by

MP, 1500s

Use it to ensure privacy not when in by hand

Moving from top down view to bottom up. Don't right thing

### ICO Privacy by Design initiative

- Increasing amounts of personal information, increasing risks to individuals
- Technology used in innovative ways to exploit personal information but not always to protect it
- Technological and procedural safeguards have lagged behind
- Better to build in protection rather than bolt on

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Headlines Huges

my long 2500 page

after some press

newly released

### ICO Privacy By Design work

- Building in not bolting on
- Tools to help
  - Privacy Impact Assessment Handbook
  - Promoting privacy enhancing technologies
  - Codes of practice/guidance
  - Information governance
  - Business case for investing in privacy protection - "the privacy dividend"

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was previously so -

Disruptive  
Business

JB etc

been involved in DP since before the  
Regulation 25 years

- Have in last 25 years have been  
public so where a new v. insurable point  
in life is and is doesn't hold public authority  
to protect for what they do, after point.

- Have in 25 years I have been  
published rules via with attention on  
their responsibilities on who would do  
this to protect other people and  
increase public authority

- Have in 25 years I have  
been on several expert bodies often  
and put better privacy & transparency  
at least of the work program

- putting words in different order
- increasing transparency as  
level to greater efficiency  
in delivery of services
- holding back data over time

## Information Governance: Roles and Responsibilities

Jonathan Bamford  
Head of Strategic Liaison



## The role of the ICO

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  - Freedom of Information Act
  - Data Protection Act
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- Provide information to individuals and organisations
- Adjudicate on complaints
- Promote good practice



## Information governance

- Key lesson from data loss incidents
- Ownership and direction from the top
- Embeds transparency, privacy and DP concerns into the culture of an organisation
- Invest to reap 'The Privacy Dividend'
- Can't be left to chance



- All things well with ICO  
responsibilities

Information governance related  
to corporate communication and  
delivery on better online business  
and greater privacy protection  
- 110 days lot of work on

- HMRC case after 2007  
- MOD laptop Facebook case

Increasingly see less and  
at data loss incidents in  
110 PIR

Ch. Info rights  
BOS Data Security Code  
- published

110 work business case  
- those who have been  
the focus  
- major against the government  
divisions



### Amount of Penalty

- Nature of contravention
- Effect of contravention
- Behaviour of Data Controller
- Impact on Data Controller
- Other Considerations

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eg small 3rd party v. Multination

Strange after - 1st time - public

### Assessment Notices

- Coroners and Justice Act 2009
- Power of audit in the absence of consent
- Government Departments - but could be extended to other public bodies and private sector
  - eg NHS Trusts

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How power too

Don't need to cite and make case

### Challenges ahead

- Government's programme on openness, transparency, privacy and information rights
- Implementation of INSPIRE regulations
- Transposition of e-Privacy directive into UK law
- Information sharing code of practice
- Report to Parliament on the state of surveillance
- Develop the Personal Information Promise
- Possible amendment to DP legislative framework in UK and EU

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NIR, contacted point to see changes to CCTV reg. NDNAD Liberty with Privacy 21st century - data protection reg. 10 years - data gov. transparency RJ

Can split into two

Just transfer code

### Why do a PIA?

- Identify and mitigate risks
- Reputation
- Public trust and confidence
- Avoid expensive "bolt on" solutions
- Enlightened self-interest

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get relevant parts together  
to discuss

Values -

Also cost of failure

public trust and confidence  
financial probabls  
VFM.

### How to do a PIA?

- ICO handbook
- Initial assessment
- Full scale or small scale PIA?
- Legal compliance check
  - Privacy law
  - Statutory powers and prohibitions
- Data protection compliance check

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Handbook - 1? fast for purpose

Do need to do one?

Scalable

incl legal compliance check

+ DP compliance checks

One message per person

### Monetary penalties

- Introduced in April 2010
- Criminal Justice and Immigration Act 2008
- Penalty of up to £500,000 for serious breaches of DP Principles, committed knowingly/recklessly
- ICO statutory guidance

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Ok - can ensure you  
right things to do - as best

- how, another incentive



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So if your organisation is  
going to be hit to meet the  
challenges of online -

transparency and greater  
control over <sup>data</sup> privacy - its inherent

governance is key -

- can't be done gradually  
approach or just trying to comply with  
letter of law - doing so now.

- Need leadership from top to  
say as organisation -

\* We are about being <sup>transparent</sup> ~~accountable~~  
for what we do and ~~being~~ <sup>how</sup> we do it

\* We are about the ~~interests~~  
outside to us to deliver public  
services ~~and all~~ <sup>in</sup> ~~the~~ <sup>public</sup> ~~interest~~

\* ~~two core values~~ <sup>transparency</sup>  
public trust and ~~accountability~~

\* We are about getting  
this right and inspiring  
public trust and ~~confidence~~  
- what we do.

TV



# Providing Greater Transparency through Ease of Information Sharing

Information Sharing and Data Protection Conference – 14 October  
2010

Graham Smith  
Deputy Commissioner



# Context

- Information as a key asset
- Growing expectations of transparency
- Consumer, societal and political demands
- Subjective individual views on privacy
- Concerns about security breaches

# Information Sharing

- Acceptance of legitimate data sharing
- Public administration and citizen benefit
- Balancing advantages with privacy risk
- Importance of transparency
- Confidence and compliance

# Transparency Agenda

- A new right to data?
- Release of datasets in re-usable formats
- Release of senior civil servants' salaries
- Central and local government expenditure
- Extending FOI beyond the public sector

# Reform of FOI?

- Reducing the burden of FOI requests
- Addressing “unintended consequences”
- Communications with the Royal Family
- Government policy and Cabinet minutes
- International obligations – EIR, “Inspire” and Re-use

# ICO Approach

- 5 years on – FOI works and is a success
- Transparency supports data sharing and individual rights
- More proactive disclosure – publication schemes
- Importance of timeliness and positive engagement
- Tougher approach to enforcement



# The Shifting Scene

- FOI has changed the landscape
- Public accountability or personal privacy
- Individual and societal expectations
- Proactive or reactive
- Trust or resignation? Maintaining confidence

# Looking Ahead

- Legislative change?
- Review of Directive
- Social norms and individual behaviour
- Technology – where next?
- Maximum transparency? Not dependent on FOI

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# Enforcing Information Rights

Christopher Graham, Information Commissioner




14 October 2010

## The view from the Commissioner


- ICO
  - Mission
  - Vision
  - Values
- Transparency and accountability
- Better regulation
  - Powers
  - Penalties
  - People
- Revising the Directive

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Big Brother is  
watching you!

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Big Brother is  
watching you!




Big Brother  
has stolen  
your identity!

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Big Brother is  
watching you!

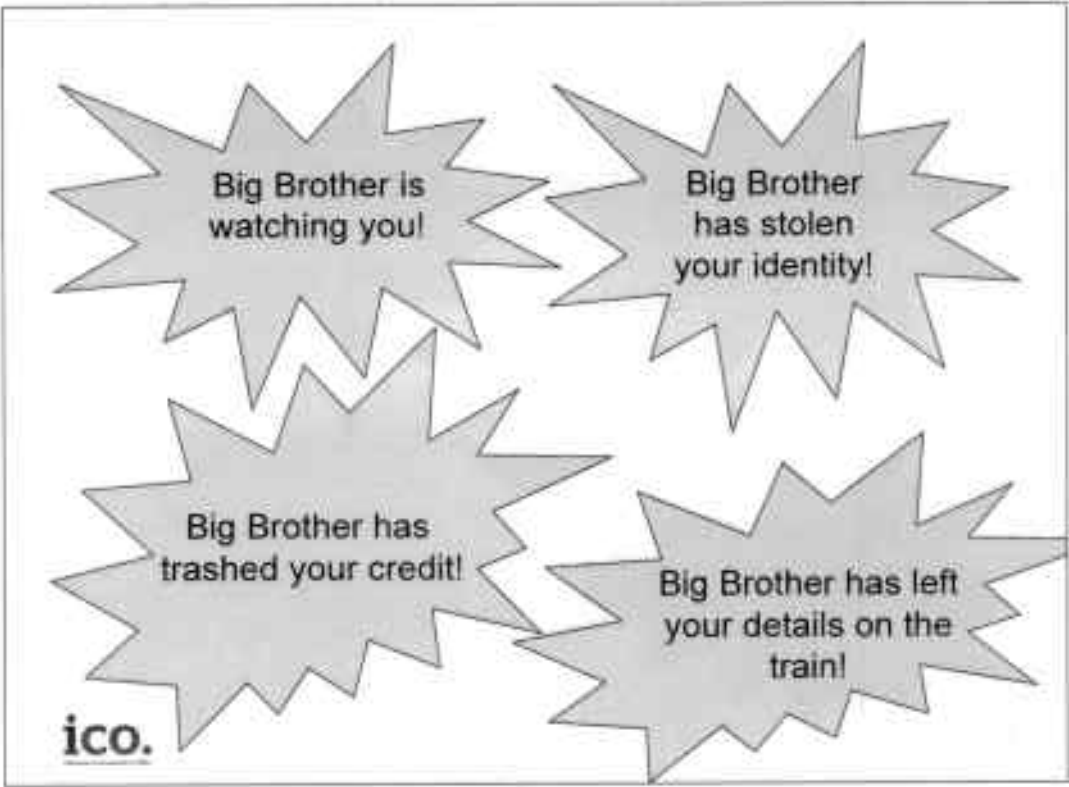


Big Brother  
has stolen  
your identity!



Big Brother has  
trashed your credit!

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Big Brother is  
watching you!

Big Brother  
has stolen  
your identity!

Big Brother has  
trashed your credit!

Big Brother has left  
your details on the  
train!

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## Our Mission

The ICO's mission is  
to uphold information rights  
in the public interest,  
promoting openness by public bodies  
and data privacy for individuals.

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## Our Vision

By 2012, we will be recognised by our stakeholders  
as the authoritative arbiter of information rights,  
delivering high-quality,  
relevant and timely outcomes,  
responsive and outward-looking in our approach,  
and with committed and high-performing staff  
- a model of good regulation,  
and a great place to work and develop.

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## Our values



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### We are:

#### Committed

We care about upholding information rights

#### Team workers

We work together as one ICO team, sharing information and expertise

#### Focused

We give priority to activities that make the biggest contribution to achieving our mission

#### Effective

We work productively and efficiently to produce high quality and timely outcomes, offering best value for customers and citizens

#### A model of best practice

We do not ask others to do what we are not prepared to do ourselves

#### Alert

We are alert to the perspectives and needs of all our stakeholders - and to the potential impact of new developments in our business

#### Fair

We treat everybody we deal with fairly and with integrity and respect. We are inclusive in our approach

#### Always learning

We are always learning and developing professionally

## Coalition priorities

What we do is where it's at

- Accountability
- Transparency
- Freedom
- Privacy

Efficiency

- Accountability drives savings
- Transparency identifies waste
- Right first time
  - Proactive disclosure and 'privacy by design' are cheaper
- Data Sharing Code of Practice

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### PRESS NOTICE

Data sharing COP consultation would be good I think – it launches this Friday and your talk would be a chance to show we're keen to take a pragmatic approach, to position ourselves as the authority and that we're taking the lead. It's useful to show we're not a hindrance to sensible data sharing.

## Better regulation

- Better regulation
  - Enabling
  - Education
  - Enforcement
- Enabling = everybody
- Education = many
- Enforcement = few

e.g. Assessments

- An audit tool to help, not a process to be managed
- Compulsory Assessments?

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Emphasising that audit isn't something to be "managed", it's a tool to help you improve your information rights handling would be useful.

Possibly talking about the DP complaints handling process and the fact that we will expect more from data controllers when they are addressing requests for information.

Monetary penalties are coming. Soon.

## Powers

- New powers introduced April 2010
  - Power of audit in the absence of consent
  - Government departments – but could be extended to other public bodies and private sector
  - Code of Practice published
- More on the way?
  - Implementing PECR
  - Compulsory breach notification

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There's not a lot that I can add to the suggestions of others. The only thing is that you might follow on from cookies and consent to say something more about the BIS consultation and in particular that the first compulsory breach notification is on the way, albeit confined to communication service providers. Also that implementation of the PECR Directive will require some increase in our powers (we think) but just how much is still under discussion.



## Penalties

- Civil Monetary Penalties introduced April 2010
- Penalty of up to £500,000 for serious breaches committed knowingly/negligently
- ICO statutory guidance available
- Amount depends on nature/effect of contravention, behaviour of/impact on data controller
- Watch this space

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## People

- Human factor
- Policies → Processes → People
- Human error
- Rogue activity
- S.55 offences

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## International Transfers

- Growth of BCR
- Mutual recognition requirement
- Improving the current procedures
- More realism needed in legal framework
- MoJ call for evidence

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## Look ahead: Revising The Directive

- Current principles are sound
- Rights and protections should be strengthened
- Greater clarity/reduction of burdens needed
- Privacy by design should be incorporated
- International transfer rules must be realistic
- Is there scope for an accountability requirement?

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# Smart Metering : the ICO Perspective

Data Privacy and The Smart Metering Implementation  
Programme Prospectus



14th OCT 2010

# The ICO

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promoting openness by public bodies  
and data privacy for individuals.

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## The role of the ICO

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  - Data Protection Act
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  - Privacy and Electronic Communications Regulations
- Provide information to individuals and organisations
- Adjudicate on complaints
- Promote good practice

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## Data Protection Principles

1. Fair and lawful processing
2. Processing for limited and specified processes
3. Adequate, relevant and not excessive
4. Accurate and up-to-date
5. Not kept for longer than necessary
6. Processed in line with individuals' rights
7. Kept securely
8. Not transferred beyond the EEA without adequate protection

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## Personal Data

- The Data Protection Act states that "personal data" means data which relates to a living individual who can be identified from that data or from that data which is in the possession of, or likely to come into the possession of, the data controller.
- So...consumption data *is* Personal Data because it can be tracked back to an individual and if the intent is to use it for billing purposes or value added services.
- Even if data is aggregated and apparently anonymous and does not contain any direct references to an individual, it could still fall into the definition of personal data if it is being used in order to make decisions about, or will affect the treatment of, an individual.
- Just because data is personal data doesn't mean that it can't be processed, it just needs to be processed according to the principles.

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# Privacy by Design

- This approach encourages organisations to give due consideration to privacy needs *prior* to the development of any new system or process, and to maintain that control through the entire life cycle of the system.
- Privacy Impact Assessments contribute to this process.
- Think through the data flows.
- Make privacy the default: customers should only see data relating to own consumption, suppliers should only see data relating to own customers and so on.
- The novelty of smart metering could lead to unforeseen threats. Think of worst case scenarios.
- If rollout is accelerated, then this shouldn't be at the expense of privacy planning.
- Deliver training to underpin ownership and awareness throughout the organisation.

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# Individual Rights

- Close inter-relationship between fair processing of personal data and safeguarding consumer interests.
- Sensitivity to potential privacy intrusion, which could make or break acceptance of smart metering.
- Frequent meter readings have the potential to reveal insights into personal lives, eg number of showers, what time you got up.
- Mandated smart metering rollout in the Netherlands was delayed because of the strength of opposition.
- In the Prospectus - **the consumer should choose in which way consumption data shall be used and by whom, with the exception of data required to fulfil regulated duties**
- Choice is good, but it needs to be real, feasible, and expectations should be managed within the context of reassurances about safeguards.
- Consumers must have an informed view of the implications of releasing personal data.
- Need to be rigorous safeguards in place to protect the home area network.

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## Likely questions from consumers

- Think about what consumers will want to know, for example:
  - Who will be accessing my personal data?
  - How will I know?
  - How can I contact the organisations who are processing my personal data?
  - Are they sharing it with anyone else?
  - What are they doing to make sure my personal data is safe?
  - What might happen to my data in the future?
  - Will my fridge be turned off?
- Make sure that information is communicated to consumers, without them having to go out of their way to find out!

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## Privacy Policy

- One of the questions from the Prospectus;
- ICO would welcome this, or some type of Code;
- Improved access, transparency, accountability;
- Identity of data controller;
- Purpose(s) for processing data.

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## Data Controllers and Responsibilities

- The Data Protection Act states that a data controller is a person who determines the purposes for which and the manner in which any personal data are, or are to be, processed.
- Not yet properly addressed as many decisions not yet made.
- Crucial importance of establishing responsibility needs to be embedded early on.
- DataCommsCo – necessary to consider the relationship between this and suppliers and third parties.



## Security

- There must be absolute certainty.
- There must be protection against unlawful processing: the key risks are unauthorised access to personal data and the unauthorised use of remote disconnection.
- Digital smart metering data is vulnerable to accessing, copying, matching, disseminating.
- Each device connected to the HAN will be a potential interface to the overall smart metering system.
- Consider all links in the chain - HAN - WAN - DCC (+ third parties).

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## Future Considerations

- The Smart Grid has been likened to the advent of the internet, which was built without privacy in mind; unlike the internet, consumers cannot opt out of the smart grid (Cavoukian).
- The escalation in the volume of personal data, presents new opportunities and challenges.
- Just as relevant to foresee privacy implications as technical and commercial ones.

## Key Points

- How personal data is defined;
- Embedding privacy into system design;
- The rights of consumers;
- What consumers will want to know;
- Assigning data controllers and clearly defined responsibilities.

## Liaison with the ICO

- Maintain dialogue;
- Develop mutual understanding of the wider picture;
- Use our resources and ask us for advice.

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# A view from the Commissioners' offices: ICO

Christopher Graham, UK Information Commissioner

First-Tier Tribunal (Information Rights) Annual Conference  
13 October 2010



A year  
of big  
changes  
at the  
ICO



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## Progress to date

### More efficient complaints handling

- FoI backlog being successfully tackled
- Tougher approach to public authorities
- Speeding up all round

### Management restructure

- Greater integration of FoI and DP activities
- Policy and strategy
- End-to-end operational process
- Reviewing processes to speed outcomes

### New Data Protection powers and penalties

- Audit assessments
- Civil Monetary Penalties

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### Alert

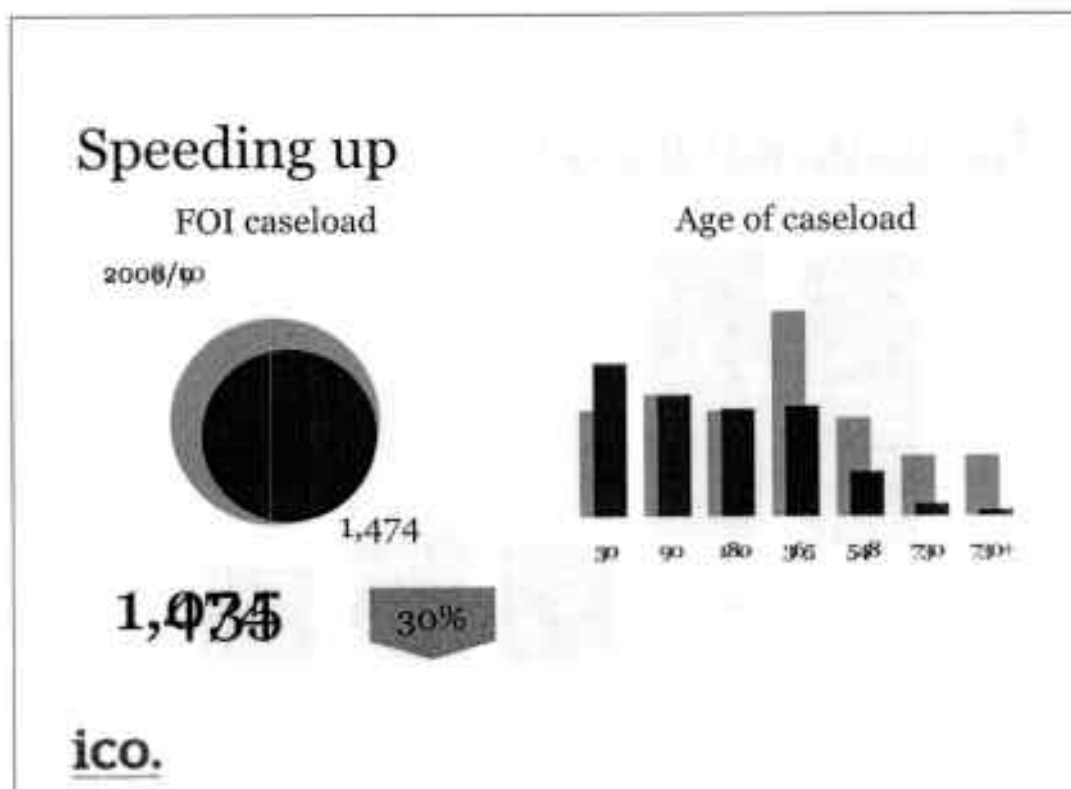
We are alert to the perspectives and needs of all our stakeholders - and to the potential impact of new developments in our business

### Fair

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We are inclusive in our approach

### Always learning

We are always learning and developing professionally



Significant reduction in the FOI backlog

FOI cases ongoing on 31 March 2009 were 1,474

One year later the figure was 1,035

A reduction of 30% - despite the fact that cases incoming were – and are - at record levels

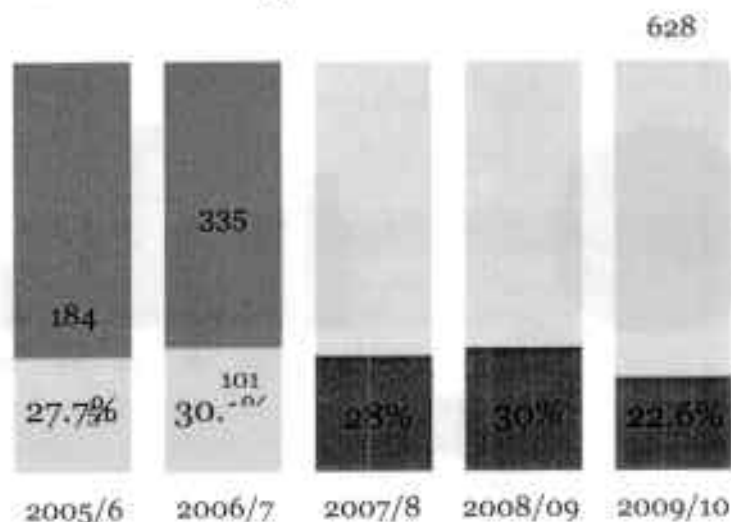
The profile of cases tells the story.

In 2009, a significant share of the caseload had been with the ICO for more than a year, two years, three years, even four years.

A year later that picture has been transformed, with the bulk of cases taking between one month and one year to resolve.

## Quantity v quality?

Decision Notices appealed



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Has the ICO sacrificed quality to quantity. You will be the judges of that.

Here is the record total of ICO Decision Notices – a record 628 in 2009/10.

Some of these are coming your way on appeal.

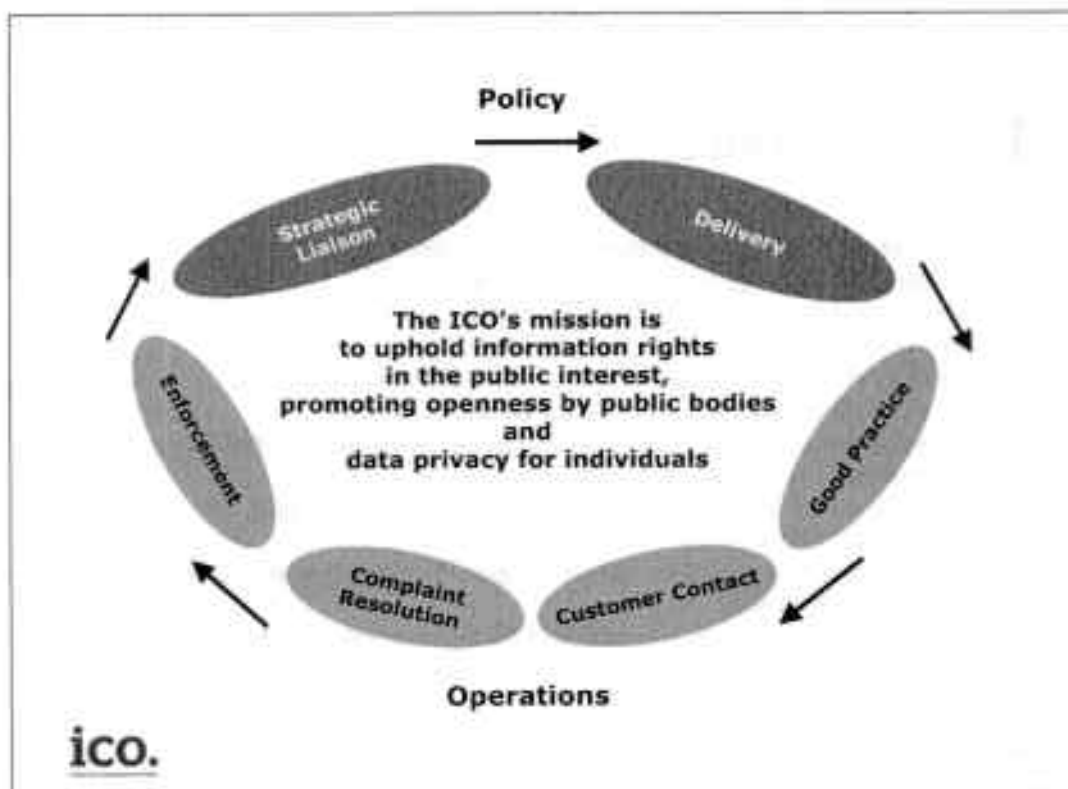
But is there any evidence that you are being asked to look at a bigger proportion of DN's?

The evidence is that however many DN's the ICO processes, about 30% will always be appealed.

Is there a change in the proportion of appeals upheld or upheld in part by the Tribunal? 27%, 30%, 22.6%

My impression is that that sort of proportion is continuing in 2010.

And of course much of the 2009/10 and 2010/11 bulge has yet to reach you.



Looking at our DP and FOI responsibilities, we want to achieve a clearer and more logical distinction between Policy and Operations. Policy deals in the general – new developments, lines to take, approaches to new problems, consistency, and high level liaison with Whitehall, Brussels and beyond. Operations deals with the specifics – this enquiry, that complaint, this data controller, that public authority. We want to build an end-to-end operational process – so that guidance, enquiries, complaints resolution and enforcement are all of a piece. But we want Operations to work within a clear framework of policy. And we want FOI and DP to be increasingly integrated.

All this means that some activities that are currently seen as just DP or just FOI will work together. And some activities that have not thought of themselves as operational will be organised as part of the end-to-end operational process – for example, parts of FOI Good Practice and Enforcement or the audit function of RAD.

## ICO approach

- Less detailed decision notices in certain circumstances, maintaining appropriate levels of investigation
- Referencing earlier Decisions, Guidance
- Making best use of limited lawyer resource
- ICO may not wish to address the Tribunal in case of
  - New exemptions relied on by public authority
  - Exemptions not considered because information otherwise exempt
  - New information advanced by public authority post DN
- Written submissions by in house team where
  - Oral hearing required by complainant, but appears to ICO to be unwarranted
  - Public authority is a party and IC agrees info not held

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In light of the increasing number of appeals / financial restrictions –

-the Tribunal rules (as of Jan 2010) require there to be an oral hearing unless all the parties consent to the appeal being determined on the papers. There may be appeals that we consider should be dealt with on the papers, but where one of the parties (often a complainant) demands an oral hearing. In such cases, whilst it would appear that the Tribunal must grant that wish, we may in the future want to restrict ourselves to written submissions only.

•there *may* be some appeals brought by complainants and where the authority is also a party where we might want to confine ourselves to written submissions only, for example where we have agreed with a public authority that it doesn't hold the information requested.

•we *may* not always wish to address the Tribunal in detail on issues that did not form part of our decision, i.e. on new exemptions relied upon by the public authority; exemptions relied upon before us but not considered by us because we found the information to be otherwise exempt, new information discovered by the authority post decision notice.



## DP: Civil Monetary Penalties

- Introduced April 2010
- Penalty of up to £500,000 for serious breaches committed knowingly/negligently
- ICO statutory guidance available
- Amount depends on nature/effect of contravention, behaviour of/impact on data controller
- Calibration
- Watch this space

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# The Future of Privacy in the Digital Society

**Jonathan Bamford**

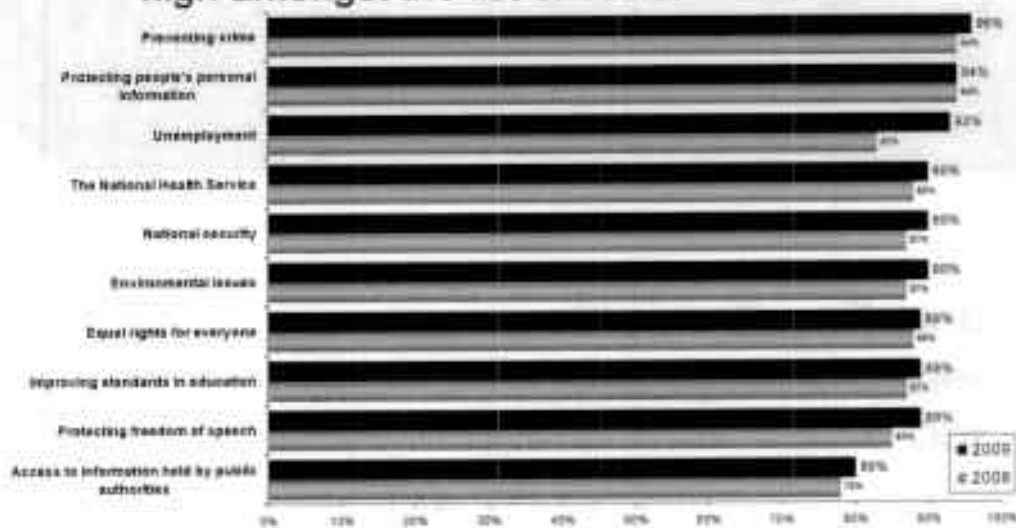
Head of Strategic Liaison

ICO

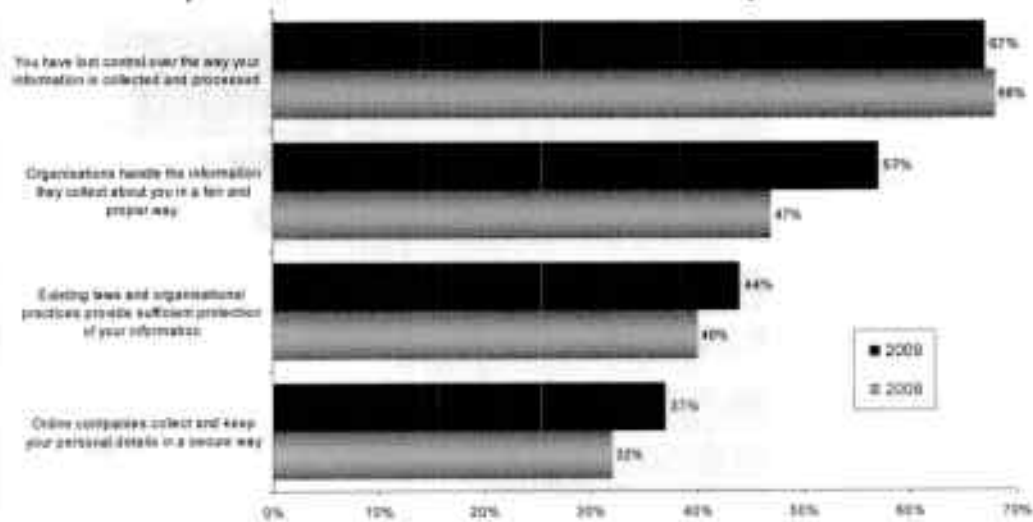
OCT 2010



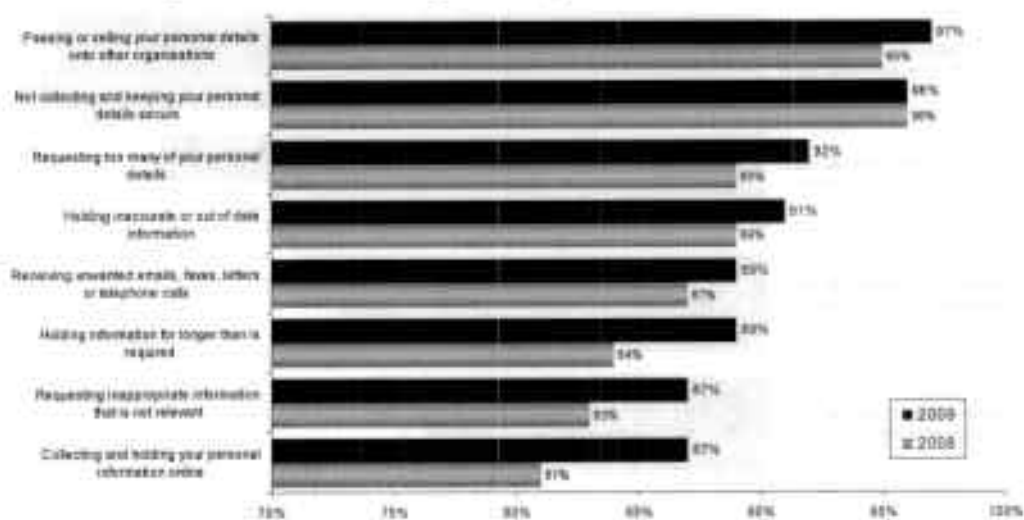
## Protecting people's personal information still ranks high amongst the list of social concerns



## The UK population are growing in confidence in the way their personal information is handled...just about!



## The public are generally very concerned about organisations using their personal information



## What's your view?

- Over the next 5 years will the risks to our personal details that are held by others:
  1. Increase a little?
  2. Increase a lot?
  3. Decrease a little?
  4. Decrease a lot?
  5. Stay the same?



## Lessons from research into public attitudes to surveillance

- ICO research in 2007
  - Widespread use of personal information now part of modern lives
  - Collection and use of personal information is of irritation and concern
  - Safeguards to protect them are expected
  - Problems should be foreseen and addressed
  - There is a guardian angel looking after them





## Demos: Private Lives: a people's inquiry into personal information

### People want:

- greater transparency
- the capacity to control and mitigate possible and sometimes unforeseen harms
- more guarantees about security.

### • Findings suggest:

- organisations should presume that people want the means to make informed decisions,
- based on clear and easily understood information about the consequences,
- about when information about them is shared and how it is used



## ICO Privacy by Design Initiative

- Increasing amounts of personal information, increasing risks to individuals
- Technology used in innovative ways to exploit personal information but not always to protect it
- Technological and procedural safeguards have lagged behind
- Better to build in protection rather than bolt on



## ICO Privacy by Design Work

- Privacy by Design report launched 2008
- Tools to help:
  - Codes of practice/guidance
  - Privacy impact assessment handbook
  - The Privacy Dividend; the business case for investing in proactive privacy protection
  - Promoting privacy enhancing technologies
  - Information assurance
  - Information governance



## What's your view?

- Should the ICO continue with its work encouraging 'Privacy by Design' or should we now leave it to others?
  1. Leave it to others
  2. Continue with the work
  3. Privacy is dead. There is nothing further anyone can do, it's all a waste of time and effort!



## **If the 'carrots' don't work, there are new 'sticks'**

- Monetary Penalties introduced in April 2010
  - Penalty of up to £500,000 for serious breaches, committed knowingly/recklessly
- Assessment Notices:
  - Power of audit in the absence of consent
  - Government Departments – but could be extended to public bodies and private sector



## What's your view?

- Is the £500,000 maximum penalty:
  1. Too high?
  2. Too low?
  3. Just about right?



## The future of privacy in the digital society

- The collection and use of personal information is expected as part of modern life
- The public are uneasy and understand the potential for intrusion/risk
- They expect safeguards to protect them if they are careless
- Protecting personal information can't be left to chance
- ....and if you do the 'sticks' just got bigger!





**Information Commissioner's Office**

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