

Information Commissioner's Office



Public Authority Statutory Equality and Good Relations Duties Annual Progress Report 2015-16

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Documents published relating to our Equality Scheme can be found at:
<https://ico.org.uk/about-the-ico/our-information/equality-and-diversity/>

Signature:

This report has been prepared using a template circulated by the Equality Commission. It presents our progress in fulfilling our statutory equality and good relations duties, and implementing Equality Scheme commitments and Disability Action Plans.

This report reflects progress made between April 2015 and March 2016

PART A – Section 75 of the Northern Ireland Act 1998 and Equality Scheme

Section 1: Equality and good relations outcomes, impacts and good practice

- 1** In 2015-16, please provide **examples** of key policy/service delivery developments made by the public authority in this reporting period to better promote equality of opportunity and good relations; and the outcomes and improvements achieved.

Please relate these to the implementation of your statutory equality and good relations duties and Equality Scheme where appropriate.

The ICO is the UK's independent regulator of information rights. Our Mission is to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

The ICO has a [Corporate Plan for 2016-19](#), which incorporates what we will do and how we will go about this. The ICO's plan has, for a number of years, included a commitment to extend the reach of the ICO, so that a wider population are aware of their information rights and are able to access our services.

The latest iteration of our plan has developed this theme further, providing additional detail about the actions we intend to take to improve the reach and accessibility of our services, and the actions that we will undertake as an employer. We have completed this to ensure that equality and diversity matters are integral to the planning process and improve our business practices.

Specifically the plan incorporates commitments to:

- Extend the ICO's reach into all parts of the country and sections of society to achieve equality of access to information rights and our services (Corporate Plan Objective 4.8)
- Raise awareness of information rights across the UK with specific commitments to Northern Ireland, Scotland and Wales (objective 1.10d)
- Consider how best to identify and act upon opportunities to work with other organisations to extend the reach of our guidance (objective 1.7)
- Target areas of greatest information rights risk: this includes raising awareness of information rights in Northern Ireland, recognising the local context (objective 1.10)
- Developing systems to enable the public to make complaints in a simple manner (objective 3.2)
- Promoting to the public how transparency initiatives, proactive disclosure and publication schemes are useful in a democratic society (objective 4.6)
- Working with organisations, including those concerned with children's safety on the internet, to maximise the impact of guidance on how individuals can protect themselves against information rights risks (objective 4.3)
- To better understand public concerns about information rights by working with civil society and other groups, which are representative of those affected by information

rights issues, and by using our own research (objective 4.4)

- Embedding diversity and our values so that they are an everyday part of how we work and of our decision making (objective 6.8)

During the year:

- We initiated discussions with other stakeholders in Northern Ireland relating to assisting citizens, and in particular the most vulnerable citizens living here, about the development of a NI Citizens' Rights Forum. This is now a planned action for 2016-17.
- We have carried out 'mystery shopper' activity to assess the services provided by our Customer Services helpline. This was conducted by an independent research organisation who described the service as "impeccable or almost impeccable across several measures in terms of call handlers being polite, professional and for callers taken seriously as well as understanding of issues." A 93% satisfaction rating was given to the service over all.
- We have completed advisory visits to organisations throughout the UK who work with, or represent, community groups or particular members of society. These have included: Different Strokes, who work with adults and children who have been affected by strokes; Dreams Come True who are a national charity working with terminally and seriously ill children and young people; The Macular Society who provide support for people affected by central vision loss; The Forum of Health and Wellbeing who support black and minority ethnic users of health and social care services; and many others.
- In Northern Ireland our advisory visits have included: the Simon Community, who work closely with homeless people; Womens Aid who provide services and advice to women who are victims of domestic violence; and Start 360 who provide services for young people.
- Continued our work on processes to ensure that cases involving the handling of Gender Recognition Certificates are completed sensitively and in compliance with the law.
- Provided advice to the Equality Commission regarding privacy, equality data and the recruitment processes used by the Northern Ireland Civil Service. This followed the joint chairing of joint workshops with the Commission in March 2015.
- The ICO established a Citizens' Reference Panel. This is part of our commitment to extend reach and obtain the public's view of our services and matters which affect members of the public. This concept is in its early stages and can be rolled out to incorporate the views of particular groups in the future.

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- The ICO was represented at the 2015 Belfast Pride event to increase awareness of the ICO's role and its relevance to the LGBT community.
- Delivered a workshop to a charity called Invisible Traffick whose objective is to abolish modern slavery. They were setting up a volunteer helpline and we provided them with advice about the privacy implications involved.
- We have given evidence on the NI Health and Social Care (Control of Data Processing) Bill and provided a response to the consultation, in which we acknowledged that the Bill would provide a legal gateway to allow the disclosure of health and social care data in certain circumstances. We stressed the importance of complying with information rights legislation regarding any intrusion on privacy and also human rights law.
- We provided a response and gave evidence to the NI Assembly on the Housing (Amendment) Act (Northern Ireland) 2011.
- We worked with the Equality and Human Rights Commission on agreed guidance on the Public Sector Equality Duty with a foreword provided by the Commissioner.
- The ICO liaised with the Department for Work and Pensions and the Royal National Institute for the Blind to develop guidance on accessibility to DWP digital services for people who are blind and partially sighted.
- We have amended our internal flexi-time policy to allow staff to start work later, which better facilitates those with caring obligations.
- We have introduced Shared Parental Leave to the organisation, as per the relevant legislation, with rates of pay that mirror those for staff on maternity leave. This has given staff a greater capacity to share child care responsibilities in the first year of their baby's life.
- We have introduced paid time off to attend ante-natal appointments for expectant fathers or partners.
- Developed and delivered on-line training for senior managers to support them to plan equality into their business objectives at the design phase.
- The ICO hosted a session for staff by a charity who work with children who have leukaemia and their families, and made them our supported charity for the year.
- We reviewed the accessibility of our services including Language Line, Text Phone and the ICO website – this has contributed to the introduction of the new Live Chat service.

Consultations

- We have responded to consultation documents where equality issues have been affected. These have included: The General Medical Council's Revised Guidance for doctors on confidentiality.
- Ofcom's Review of how they use their persistent misuse powers, focussing on silent and abandoned calls.
- We submitted a response to the NI Equality Commission's review of S75.
- Ofgem's Priority Services Register Review – this consultation concerned the protection of information about the most vulnerable customers, so that they receive continuity of service, but their information is stored securely. This involved working with the Customer Safeguarding Working Group.
- Charity Fundraising: we responded to separate consultations undertaken in England and Wales, Scotland, and Northern Ireland. This followed concerns raised about the targetting of vulnerable people by fundraising organisations. This included a commitment to continuing to provide information and advice to charities on their responsibilities under the law when fundraising. We also gave evidence to the Public Administration and Constitutional Affairs Committee enquiry into fundraising in the charitable sector.
- Human Trafficking: The ICO gave evidence to the N.Ireland Department of Justice consultation on its Human Trafficking and Exploitation Strategy. We also gave evidence to the Scottish Parliament on the Human Trafficking and Exploitation (Scotland) Bill.
- Scottish Government's consultation on its Adoption Register Regulations 2016: The ICO responded to emphasise the importance of maintaining the privacy of both the child and the prospective adopter.

The ICO has also conducted formal consultations with the public and stakeholders, and have also gathered views from a range of events held throughout the UK. These included:

- 'Privacy Notices, transparency and control – a code of practice on communicating privacy information to individuals'
- 'The ICO Corporate Plan 2016-19' where we sought views from the public and stakeholders regarding the actions we plan to take in the coming years; and

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- Conferences for Data Protection and Freedom of Information Practitioners, 'Listening events' and workshops.

- 2 Please provide **examples** of outcomes and/or the impact of **equality action plans/** measures in 2015-16 (*or append the plan with progress/examples identified*).

During the year:

- We have applied our enforcement powers effectively to tackle the issue of nuisance calls, which affect many vulnerable members of our community. This included issuing a fine to Advice Direct Limited for £20,000, for marketing a service which professed to help people claim damages for hearing loss working in a noisy environment.
- We took action to improve the practice of other organisations, who have responsibility for helping vulnerable members of our community such as Age International, Preferred Pension LLP, Anxiety UK and Alzheimers Society.
- We issued a fine to Pharmacy 2 U after an investigation revealed that information about vulnerable patients had been sold to third parties who then particularly targeted men aged over 70 in a lottery type scam. This action sent a clear message to organisations that profiling and targeting of this nature was not compliant with the law and that the ICO would take action.
- The ICO has responded to a further request from the DHSSPS requiring evidence from the ICO in respect of data protection compliance with regard to the Draft Adult Safeguarding Strategy. This strategy aims to create a basis for sharing information in cases where adults are deemed to be at 'risk from harm'.
- We worked with the Consumer Council and Action on Hearing Loss to deliver a bespoke awareness raising workshop on data protection issues.
- We commented on the Housing (Amendment) Act (Northern Ireland) 2011 with respect to sharing of information with regard to anti-social behaviour issues related to individuals.
- We have continued to consider measures within our reasonable adjustments policy with respect to individuals who contacted us on the Belfast helpline.
- We have provided accessible assistance on the Belfast helpline – for example we received a call on the helpline from a gentleman who was trying to register for a third level education course. The online registration process appeared to ask for more information than was necessary - it was compulsory to give this information in order to proceed. As he has dyslexia, this information was of a more sensitive nature to him than it may be to other students. He was given information about data protection principles which he said he would use when speaking to the organisation. Furthermore when he was directed towards the page on the ICO website about how to raise a concern with an organisation he was very happy to see that a template letter was provided as this would make the task less difficult for him given the fact that his dyslexia makes reading and writing more time consuming for him.

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- ICO staff have attended a NI Equality Commission Conference on age discrimination
- The ICO office responded to several Government and NI Civil Service consultations, which included aspects of E & D –
 - DOJ - Consultation on guidance for criminal records filtering review mechanism [The -Mental Capacity Bill NI](#)
 - [Draft NI Human Trafficking and Exploitation Strategy 2015 – 2016](#)
 - DHSSPS Co-operating to Safeguard Children and Young People in Northern Ireland

Of the activities listed above, the following had an equality dimension to them:

- Our participation at a conference run by the Patient & Client Council on homelessness and access to health care.
- Our involvement in a round table discussion on financial harm and older persons.
- Our advice given in relation to the development of a smart phone application aimed at individuals in need of urgent assistance in conflict related areas.
- Our ongoing work with the Northern Ireland Council for Voluntary Action.
- Our response to the consultation on the Lifeline Crisis Support Service.
- Our workshops with both the Simon Community and Women's Aid.
- The ICO continues to make adjustments for staff to help them to stay in work or to access learning opportunities. These have included changes to the work environment, flexible working times, home working and training materials provided in a variety of formats.
- The ICO's Equality and Diversity Committee has continued to monitor equality based activity undertaken by the ICO, and equality data is reported to the organisation's Management Board.
- There has been an increase in the proportion of new recruits who identify themselves as from a Black, Asian or Minority Ethnic Community with around 10% of new staff during 2015/16 being from these communities.

In addition, the ICO Equality Plan has been redrafted and is currently being reviewed.

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3 Has the **application of the Equality Scheme** commitments resulted in any **changes** to policy, practice, procedures and/or service delivery areas during the 2015-16 reporting period? (*tick one box only*)

X Yes No (go to Q.4) Not applicable (go to Q.4)

Please provide any details and examples:

The ICO changed the 'Concerns form' which is received from individuals when they wish to raise a complaint about an information rights issue involving an organisation or public body. The amendment allowed us to establish the customer's desired outcome at an earlier stage, enabling us to act earlier and achieve a more effective outcome. This has helped to promote access to information rights by removing some of the procedural barriers that have previously been in place.

The ICO has also instigated discussions with disabled members of staff to obtain their views and feedback about their experience of working in the organisation.

We have enhanced our approach to flexible working with greater capacity to work in a flexible manner, such as later start times which supports those with caring commitments, and the ability to take 'flexi-days' off work.

The ICO has recently established a Citizens' Reference Panel to influence the development of policies, practices and actions. We are planning to develop a similar forum within NI.

There has been further refinement of our approach to the handling of cases involving Gender Recognition Certificates.

3a With regard to the change(s) made to policies, practices or procedures and/or service delivery areas, what **difference was made, or will be made, for individuals**, i.e. the impact on those according to Section 75 category?

Please provide any details and examples:

The change to the 'Concerns form' will help us quickly signpost persons to the organisations best suited to assist them and improve accessibility to information rights.

Discussions with disabled members of staff to obtain their views and feedback about their experience of working in the organisation will lead to a better understanding of actions we need to take to achieve a more effective and inclusive workplace.

The extension of flexible working practices will help staff with caring commitments with dependents in the mornings, or take time off for appointments. The extension of flexi

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days will also assist staff wishing to take time off for religious festivals etc.

The Citizens' Reference Panel and NI Forum will help identify our priorities as we develop new guidance in preparation for legislative changes taking effect from May 2018.

The refinement of our approach to the handling of cases involving Gender Recognition Certificates will improve staff awareness of how to process complaints involving GRCs.

3b What aspect of the Equality Scheme prompted or led to the change(s)? *(tick all that apply)*

- As a result of the organisation's screening of a policy *(please give details):*

- As a result of what was identified through the EQIA and consultation exercise *(please give details):*

- As a result of analysis from monitoring the impact *(please give details):*

- As a result of changes to access to information and services *(please specify and give details):*

- Other *(please specify and give details):*

Our E&D Committee is helping raise overall awareness of equalities objectives throughout the organisation. All teams are encouraged to consider E&D matters at their meetings and feedback is given to SMT. E&D activity is specifically recorded in the quarterly reports of the three ICO regional offices.

The service developments that we have implemented reflect our corporate objectives to improve equality.

Section 2: Progress on Equality Scheme commitments and action plans/measures

Arrangements for assessing compliance (Model Equality Scheme Chapter 2)

- 4 Were the Section 75 statutory duties integrated within job descriptions during the 2015-16 reporting period? *(tick one box only)*
- Yes, organisation wide
 - Yes, some departments/jobs
 - No, this is not an Equality Scheme commitment
 - No, this is scheduled for later in the Equality Scheme, or has already been done
 - Not applicable

Please provide any details and examples:

Although not a specific commitment, consideration of E&D matters and behaviours in this regard is a core part of our code of conduct which was reviewed in the latter part of 2015/16 and reintroduced in April 2016.

The concepts of equality and diversity are reflected within the organisation's Values Framework - a key area of which is 'fairness', and all staff are required to undertake Dignity, Diversity and Inclusion training when they start working with the ICO.

Our customer service processes and disciplinary procedures embed this approach.

- 5 Were the Section 75 statutory duties integrated within performance plans during the 2015-16 reporting period? *(tick one box only)*
- Yes, organisation wide
 - Yes, some departments/jobs
 - No, this is not an Equality Scheme commitment
 - No, this is scheduled for later in the Equality Scheme, or has already been done
 - Not applicable

Please provide any details and examples:

It is important to state this is not a blanket approach but within our new Personal Development Record (PDR) guidance and processes for all staff, the process informs managers that they may wish to set objectives on improving equality and diversity performance outcomes. There is a general obligation to ensure that all staff comply with relevant legislation but both the Assistant Commissioner for Scotland and Northern Ireland and the Group Manager (Policy & Practice) NI both have specific duties with

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regard to s75. The Assistant Commissioner also co-chairs the E&D Committee.

In the 2015-16 reporting period were **objectives/ targets/ performance measures** relating to the Section 75 statutory duties **integrated** into corporate plans, strategic planning and/or operational business plans? *(tick all that apply)*

- Yes, through the work to prepare or develop the new corporate plan
- Yes, through organisation wide annual business planning
- Yes, in some departments/jobs
- No, these are already mainstreamed through the organisation's ongoing corporate plan
- No, the organisation's planning cycle does not coincide with this 2015-16 report
- Not applicable

Please provide any details and examples:

In developing our Corporate Plan for 2015/16, we ensured that our commitment to developing sound equality practices were elaborated upon.

These have included commitments to:

- Broaden our communications channels to raise greater awareness of information rights across the UK;
- Raising awareness of information rights in Northern Ireland;
- Working with organisations, including those concerned with children's safety on the internet, to maximise the impact of guidance on how individuals can protect themselves against information rights risks;
- To better understand public concerns about information rights by working with civil society and other groups, which are representative of those affected by information rights issues, and by using our own research.
- Extending the ICO's reach into all parts of the country and sections of society to achieve equality of access to information rights and our services.
- Embedding diversity and our values so that they are an everyday part of how we work and of our decision making.

Equality action plans/measures

7 Within the 2015-16 reporting period, please indicate the **number** of:

Actions completed:	<input type="text" value="n/a"/>	Actions ongoing:	<input type="text" value="n/a"/>	Actions to commence:	<input type="text" value="n/a"/>
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Please provide any details and examples (*in addition to question 2*):

Earlier in this document we have cited several examples of our plans and actions which impact on improving equality and accessibility of our services and information rights for the public. These are embedded within our corporate plans and business plans. Examples of the actions we have taken are provided earlier in the document.

As identified above in Q2, many of our actions are ongoing such as :

- Establishing a citizens’ rights forum in NI, in partnership with other organisations with an interest or commitment to S75 groups, such as the Consumer Council, the Police Service Northern Ireland, the Health and Social Care Board and the Northern Ireland Commissioner for Older People.
- Offering accessible services to citizens who contact our helpline.
- Carrying out advisory visits to groups and organisations who care for and support S75 groups, such as the Simon Community and Women’s Aid.
- Providing bespoke support and advice to small charities requiring assistance with understanding how to protect the privacy of individuals, such as Invisible Traffick.

8 Please give details of changes or amendments made to the equality action plan/measures during the 2015-16 reporting period (*points not identified in an appended plan*):

Following consultation with the Equality Commission throughout this period a reviewed Equality plan will shortly be submitted to the Commission.

9 In reviewing progress on the equality action plan/action measures during the 2015-16 reporting period, the following have been identified: (*tick all that apply*)

- Continuing action(s), to progress the next stage addressing the known inequality
- Action(s) to address the known inequality in a different way
- Action(s) to address newly identified inequalities/recently prioritised inequalities
- Measures to address a prioritised inequality have been completed

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The ICO approach involves a continued assessment of equality issues through the Senior Management Team and the Equality and Diversity Committee. Examples of how these are addressed are set out in Section 1 part 1 and in Section 2 part 7.

Arrangements for consulting (Model Equality Scheme Chapter 3)

10 Following the initial notification of consultations, a targeted approach was taken – and consultation with those for whom the issue was of particular relevance: *(tick one box only)*

- All the time Sometimes Never

11 Please provide any **details and examples of good practice** in consultation during the 2015-16 reporting period, on matters relevant (e.g. the development of a policy that has been screened in) to the need to promote equality of opportunity and/or the desirability of promoting good relations:

The Data Protection Act places obligations on the Information Commissioner to consult on guidance and codes of practice where appropriate. We publicise our consultations through our website, newsletters and by targeting particular groups when that is relevant.

Our Consultation Policy sets out the timeframes used for consultations and stipulates that documentation is written in plain English and in a format compatible with the website's Browsealoud facility. Consultation documentation can also be made available in braille or audio format.

Our policy states that if face to face consultation sessions take place, the needs of participants will be fully considered and venues chosen which are fully accessible.

During the course of 2015/16 we worked closely with Access Northern Ireland on an updated Code of Practice regarding the legislative changes relating to criminal records during this period. We consulted the public on the development of Privacy Seals, which follows a consultation regarding Privacy Notices, transparency and control. We have also responded to the consultation documents of other organisations including HMRC; the Land Registry; DCLG and Cabinet Office.

12 In the 2015-16 reporting period, given the consultation methods offered, which consultation methods were **most frequently used by consultees**: *(tick all that apply)*

- Face to face meetings
- Focus groups
- Written documents with the opportunity to comment in writing
- Questionnaires
- Information/notification by email with an opportunity to opt in/out of the consultation

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- Internet discussions
- Telephone consultations
- Other (*please specify*):

Please provide any details or examples of the uptake of these methods of consultation in relation to the consultees' membership of particular Section 75 categories:

13 Were any awareness-raising activities for consultees undertaken, on the commitments in the Equality Scheme, during the 2015-16 reporting period? (*tick one box only*)

- Yes No Not applicable

Please provide any details and examples:

We are planning a wide consultation exercise with stakeholders shortly on the updated ICO Equality Plan.

14 Was the consultation list reviewed during the 2015-16 reporting period? (*tick one box only*)

- Yes No Not applicable – no commitment to review

Arrangements for assessing and consulting on the likely impact of policies (Model Equality Scheme Chapter 4)

[

15 Please provide the **number** of policies screened during the year (*as recorded in screening reports*):

16 Please provide the **number of assessments** that were consulted upon during 2015-16:

Policy consultations conducted with **screening** assessment presented.

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- 21** In analysing monitoring information gathered, was any action taken to change/review any policies? *(tick one box only)*

Yes No X Not applicable

Please provide any details and examples:

- 22** Please provide any details or examples of where the monitoring of policies, during the 2015-16 reporting period, has shown changes to differential/adverse impacts previously assessed:

See response to Q23

- 23** Please provide any details or examples of monitoring that has contributed to the availability of equality and good relations information/data for service delivery planning or policy development:

The ICO has a range of mechanisms and methods for collecting information that can inform policy development and assess performance which can support our efforts in relation to advancing equality of opportunity. Collecting information to help understand inequalities and the needs of staff and customers is central to the role of the Equality and Diversity Committee in informing Corporate Policy.

We are keen to identify ways to enhance the information we gain from these in relation to the particular experiences of people with protected characteristics in order to ensure a more inclusive and responsive service, for example we retain a log of customers for whom adjusted services are required to support their needs, and we have mapped the adjustments made to support staff.

Monitoring of recruitment statistics helps to inform decisions around the appropriate and effective avenues for the administration on internal and external recruitment, which will give fair access to the roles we have available.

Staff Training (Model Equality Scheme Chapter 5)

- 24** Please report on the activities from the training plan/programme (section 5.4 of the Model Equality Scheme) undertaken during 2015-16, and the extent to which they met the training objectives in the Equality Scheme.

Staff receive training regarding their equality obligations as part of their induction. Our training course 'Dignity, Diversity and Inclusion' ensures staff are aware of their rights and obligations in respect of equality matters, around 100 staff attended such training in 2015/16.

In addition, we have an on-going programme of training which incorporates the most operationally significant equality issues including information regarding Mental Health;

Autism; and Asperger's, to date 263 staff have attended this training.

Managers receive training on employment law issues, which include an equality dimension. This year we launched an on-line training resource for managers called 'Planning for Equality' which is designed to allow decision makers aware of how equality issues can be addressed by design, rather than being an 'add on' at the end of the planning process. The Senior Management Team have received briefing updates from an Equality Adviser to help keep the issue to the fore when making decisions.

We have continued our recruitment training for managers, which addresses issues such as employment law, fairness and unconscious bias. This helps to ensure that our processes are fair and focussed on selecting candidates based on their skills, knowledge and abilities.

- 25** Please provide any examples of relevant training shown to have worked well, in that participants have achieved the necessary skills and knowledge to achieve the stated objectives:

As mentioned above, the 'Planning for Equality' training has helped managers to understand how equality is seen as good for the organisation's business. The on-line approach to this training gave considerable flexibility in the delivery of this training.

We have continued to deliver Human Rights training for many of our staff, which has helped them to understand the importance of accessibility of our services to all members of the community.

The awareness sessions for Autism and Asperger's have received excellent feedback and staff have reported that the training has had a tangible impact on their work and how they deliver services.

Public Access to Information and Services (Model Equality Scheme Chapter 6)

- 26** Please list **any examples** of where monitoring during 2015-16, across all functions, has resulted in action and improvement in relation **to access to information and services**:

We retain an adjustment log so that we are aware of the circumstances when customers have required an alteration to the services we provide in order to meet their needs. We have an allocated officer who oversees the log and makes sure that we adhere to the adjustments agreed with the customer. This is an on-going resource which is continually updated.

Our Customer Services training has contributed to the outstanding performance assessment of our Customer Helpline. We have monitored the performance of the helpline and plan to do so again in the next 18 months. We have also introduced an on-line 'live chat' service from the helpline which provides members of the public with the opportunity to communicate with the helpline through real time written communication. This is another means of improving accessibility of our services for individuals who have difficulties speaking or hearing.

Complaints (Model Equality Scheme Chapter 8)

27 How many complaints **in relation to the Equality Scheme** have been received during 2015-16?

Insert number here:

0

Please provide any details of each complaint raised and outcome:

Section 3: Looking Forward

28 Please indicate when the Equality Scheme is due for review:

The revised Scheme will be submitted shortly to the Equality Commission for review with a view for implementation in 2016/17.

29 Are there areas of the Equality Scheme arrangements (screening/consultation/training) your organisation anticipates will be focused upon in the next reporting period? *(please provide details)*

Yes, we are intended to publish a revised Equality Scheme.

30 In relation to the advice and services that the Commission offers, what **equality and good relations priorities** are anticipated over the next (2016-17) reporting period? *(please tick any that apply)*

- Employment
- Goods, facilities and services
- Legislative changes
- Organisational changes/ new functions
- Nothing specific, more of the same
- Other (please state):

PART B - Section 49A of the Disability Discrimination Act 1995 (as amended) and Disability Action Plans

1. Number of action measures for this reporting period that have been:

14

Fully achieved

1

Partially achieved

1

Not achieved

2. Please outline below details on all actions that have been fully achieved in the reporting period.

2 (a) Please highlight what **public life measures** have been achieved to encourage disabled people to participate in public life at National, Regional and Local levels:

Level	Public Life Action Measures	Outputs ⁱ	Outcomes / Impact ⁱⁱ
National ⁱⁱⁱ	We ensure that anyone can apply to be a member of the ICO Management Board, and make a statement within our advertisements that we welcome applications from members of all communities. The ICO advertised for a new Commissioner during the year and applications were encouraged from all sections of society.	Disabled people can apply for these positions, and have done so during the reporting period.	Ensuring disabled people have the right to apply for these positions and have adjustments made to the process if necessary. This therefore increases access opportunities within public life as well as promote good practice with others.
Regional ^{iv}	Across the ICO, we ensure a policy for disabled staff to have reasonable adjustments which enables them to	This reasonable adjustment policy ensures that all staff have an opportunity to	All staff can participate in any internal groups within the ICO, such as the ICO green group, which aims

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	apply for work, or stay in work if they become disabled.	undertake any internal public life opportunities	to raise awareness of environmental issues across the organisation. Disabled staff represent the ICO to external stakeholders and customers.
Local ^v	Overall ICO recruitment takes account of any applicants with disabilities. We apply the "Two Ticks' standard which guarantees a job interview for disabled candidates who meet the minimum specification for the job for which they have applied	Ensures access opportunities for all staff who apply to the ICO, including any people with disabilities.	Fair recruitment practice to ensure people with disabilities can apply for ICO positions.

2(b) What **training action measures** were achieved in this reporting period?

	Training Action Measures	Outputs	Outcome / Impact
1	Training on diversity, diversity and inclusion continues to be delivered to all staff, including new starters.	Staff are trained to be aware of the legislation and also be mindful of each other's dignity and the value of diversity to the organisation.	Better service for our staff who are disabled and improved service delivery for disabled people. A more aware and understanding workforce.
2	Issues relating to equality and diversity are referred to in our corporate induction and is being expanded to increase impact. These training courses cover all equality strands, which include disability related matters.	Staff are trained to be aware of the legislation and also be mindful of each other and be alert to the needs of customers who may be disabled.	Better service for our staff who are disabled and improved service delivery for disabled people.

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3	The corporate induction includes reference to the Public Sector Equality Duty and Disability Discrimination Act.	Staff are trained to be aware of the legislation and also be mindful of each other.	Better service for our staff who are disabled and improved service delivery for disabled people.
4	Enhanced training for specific roles includes mental health awareness training that incorporates Autism and Aspergers training.	Staff are trained to be aware of the legislation and the potential needs of service users.	Better service for our staff who are disabled and improved service delivery for disabled people.
5	Recruitment training includes reference to reasonable adjustments for disabled job applicants.	Recruiting managers are aware of their legal and policy obligations, and understand the business benefits of diversity and applying a fair approach.	A recruitment process which provides disabled applicants fair to access opportunities, and which encourages applications from people who are disabled.
6	The ICO continues to make reasonable adjustments to training and development opportunities for staff who are disabled. This will help to encourage and retain participation in public life by disabled people.	Training venues are selected to ensure that they are accessible for disabled delegates. This includes sending training materials in advance or in different formats for disabled delegates for whom the standard format is not accessible.	Disabled staff have access to the same standard of training that non-disabled staff have, and therefore have equality of access to increased skills and knowledge.
7	We have provided training to staff using a 'live chat' service to access our Customer Services.	The live chat service is operational and staff are trained to provide services.	Live chat provides an alternative method for accessing our services which may be beneficial to disabled people, for example people who are hearing impaired or have other difficulties using the telephone.

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2(c) What Positive attitudes **action measures** in the area of **Communications** were achieved in this reporting period?

	Communications Action Measures	Outputs	Outcome / Impact
8	Delivered training to enhance service to customers of the ICO who have Aspergers / Autism and have been identified based on analysis of caller interactions.	Staff are trained to be aware of the legislation and also be mindful of each other.	Better service for our staff who are disabled and improved service delivery for disabled people
9	The E&D committee has identified the opportunity to increase awareness and expertise internally around particular disability issues that affect staff and customers. The ICO also held a Mental Health Awareness Week. ICO operates a policy whereby customers are supported in receiving services.	Awareness weeks have been carried out in the ICO on equality and diversity issues and blogs been also been completed.	Better service for our staff who are disabled and improved service delivery for disabled people. Increased understanding of some of the issues faced by other protected groups.
10	Departments have been required to complete returns to record the activity they have undertaken which impact on improving equality, diversity and accessibility to information rights and our services	We are able to communicate to staff throughout the organisation the nature of the work we do which helps to support various groups, including those which support or represent protected groups.	Improved awareness of activity in the organisation. Improved communication of this has helped to build links between different strands of activity and achieve better outputs.

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2 (d) What action measures were achieved to ‘**encourage others**’ to promote the two duties:

	Encourage others Action Measures	Outputs	Outcome / Impact
11	As part of the ICO procurement policy, we have taken decisions that have ensured that contractors are not awarded work if there is not an effective equality and diversity plan in place	Organisations who do not take account of appropriate equality measures are not awarded contracts.	Organisations improve and update their practice as a result.
12	We have encouraged other organisations to provide the information to customers in an accessible format and reminded them of their equality obligations.	The public bodies have provided information in an appropriate format.	Better customer service for affected members of the public and increased awareness of equality obligations amongst other organisations.

2 (e) Please outline **any additional action measures** that were fully achieved other than those listed in the tables above:

	Action Measures fully implemented (other than Training and specific public life measures)	Outputs	Outcomes / Impact
13	We have continued to participate in consultation exercises regarding legislation which has potential to impact on	Involvement in the issues facing the wider community, and ensuring that information rights issues are taken into account when legislation affecting	Improvements to the final legislation and enhanced rights for disabled people affected by it

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	disabled people.	disabled people is being considered.	
14	We have continued to complete advisory visits and worked closely with organisations such as the Alzheimer’s Society.	Organisations will more readily provide information to people acting on behalf of people with dementia to help them manage their affairs.	The three ‘know about’ sessions run in the ICO have helped educate the ICO staff on how on how better to deal with people with dementia and those acting on their behalf

3. Please outline what action measures have been **partly achieved** as follows:

	Action Measures partly achieved	Milestonesvi / Outputs	Outcomes/Impacts	Reasons not fully achieved
1	The ICO will ensure that equality matters, including those related to disability, are integrated into the business planning process. This will be assisted with training for senior managers	Aims completed and working in practice across the organisation	Equality matters are integrated into the business planning process	Still ongoing in the organisation

4. Please outline what action measures **have not been achieved** and the reasons why.

	Action Measures not met	Reasons
1	We have not gathered equality data in our key ‘Annual Track’ survey, in this period as we had initially intended.	We changed the service provider of the annual track survey and the additional questions and analysis requirements were not included before the survey needed to be

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		launched. We plan to include demographic questions and data analysis in the next annual track survey to be conducted in 2017.
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5. What **monitoring tools** have been put in place to evaluate the degree to which actions have been effective / develop new opportunities for action?

(a) Qualitative

Work has been completed with disabled staff to ensure reasonable adjustments and appropriate mechanisms are in place and obtain their views of working at the ICO. This collaboration has enabled us to gather ideas for how we can improve aspects of how we work and our work environment.

Our helpline services have a reasonable adjustment register and staff who have been designated with responsibility for supporting customers who have particular needs eg helping members of the public to make Subject Access Requests to organisations if they have difficulty in doing so.

(b) Quantitative

We report quarterly to our management board. This includes information about the proportion of staff who regard themselves as being disabled. Our staff survey has been used as a method of gathering demographics about staff which are not systematically gathered using our HR systems.

6. As a result of monitoring progress against actions has your organisation either:

- made any **revisions** to your plan during the reporting period or
- taken any **additional steps** to meet the disability duties which were **not outlined in your original** disability action plan / any other changes?

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Please select

If yes please outline below:

	Revised/Additional Action Measures	Performance Indicator	Timescale
1			
2			
3			
4			
5			

7. Do you intend to make any further **revisions to your plan** in light of your organisation's annual review of the plan? If so, please outline proposed changes?

Yes, a new Equality Plan has been drafted which we will shortly be submitting to the Equality Commission for review.

ⁱ **Outputs** – defined as act of producing, amount of something produced over a period, processes undertaken to implement the action measure e.g. Undertook 10 training sessions with 100 people at customer service level.

ⁱⁱ **Outcome / Impact** – what specifically and tangibly has changed in making progress towards the duties? What impact can directly be attributed to taking this action? Indicate the results of undertaking this action e.g. Evaluation indicating a tangible shift in attitudes before and after training.

ⁱⁱⁱ **National** : Situations where people can influence policy at a high impact level e.g. Public Appointments

^{iv} **Regional**: Situations where people can influence policy decision making at a middle impact level

^v **Local** : Situations where people can influence policy decision making at lower impact level e.g. one off consultations, local fora.

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^{vi} **Milestones** – Please outline what part progress has been made towards the particular measures; even if full output or outcomes/ impact have not been achieved.