Hi Louise,

I met with Faye today to finally catch up over the staff mobilisation project. It sounds like a lot of great work is already being explored and planned in, such as additional resources around customer journey and what needs to be updated on the website and IVR, FAQ's to go onto the website and the introduction of a new SAR click thinking tool.

Faye and I discussed whether a decision has been reached yet around whether we go with a total channel shift or a nudge technique. We chatted through the below 2 options...

Option 1 – A total switch off of the Business advice line, with a 100% channel shift to online self serve. Customers would be supported via Live chat between 9-5, Monday to Friday, or
Option 2 – We go with a nudge channel shift approach which would include redesigning the webpages and the messaging on the IVR so that we promote self-serve and live chat ahead of emails and the helpline, but we don't turn the business advice lines off. The aim of this approach would be to see the majority of customers self serve, but we do run this risk that we wouldn't make the efficiencies we need.

We have both agreed that we should be bold so want to go with **option 1** and run a pilot to see what reaction we get to removing the helpline. For example, we would want to measure rogue calls to other ICO lines and numbers, if we see an increase in service complaints etc and if we run the ICS survey across Q3 we will also gather some customer satisfaction insight into satisfaction levels linked to the online channel.

For both options we will have to conduct an Equality Impact Assessment and come up with a process for enabling customers with a Reasonable Adjustment to access our services differently if the online journey wasn't accessible to them.

What we have agreed is that it would be sensible, as part of the project to have option 2 planned and prepped as a contingency measure, so that if we want to deploy option 2 at any point, we can do so quickly and seamlessly.

In terms of next steps, I want to talk to you about ownership of this project, as whist I offered to lead on this, I did so on the understanding that Faye is stretched with all the other initiatives and projects around DP fees. Having chatted with her today, she told me that she has quite a bit of capacity to run this project now that acquisitions is underway and the NOI and third party projects have been handed over to Mike to lead on.

Given the great work that Faye has led on so far and that Katie currently has a smaller workload in the Outbound Project compared with Paula on the Inbound, I suggest that this project best stays with Faye. Having chatted it through with her today I know she is keen to lead this piece of work and sees it as an extension of her BAU Head of Role. So how would you feel if Faye leads the Project in the Inbound workstream, but I support the work, especially around the EQIA assessment and any discussions with TU?

I am very happy to lead and support in anyway, but I actually think that now we have reached an agreement on the approach, Faye is best placed to run this project.

Happy to discuss in the morning, before the three of us meet to talk about Channel Shift as it would be good to get your take on this and thoughts before we discuss with Faye.

Thanks

Suzanne

Suzanne Gordon (she/her)

Director of Public Advice & Data Protection Complaints Services

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Suzanne.Gordon@ico.org.uk
twitter.com/iconews
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Extract from ET fortnightly meeting papers

19 Sept 24

Channel Shift: Inform TU's 20 September. Develop technical updates required to support self serve. Develop internal and external comms

3 Oct 24

Channel Shift: Internal comms will be shared on 8 October. Deploy technical updates required to support self-serve. Develop external comms. Develop mechanisms to measure benefits and feedback.

Extract from PB papers

18 Oct 24

Channel shift – a three-month pilot started on 11 October. Colleagues that have previously operated the BAS helplines have been mobilised to work on payments and penalties. New tools have been developed to support and encourage customers to start their journey online. Updates have been made to the website and a smart survey has been added to measure the impact.

Channel shift – Monitor impact and demand, continue to develop tools to support self-service.

Extracts from stand up meeting notes

24 Sept 24

Channel Shift

- Self-serve options will be ready after 1 October.
- Risk of level C employees could feel like they're doing level D work.
- Discussed options of how to mitigate this risk whether we could look into the reward and recognition policy.
- IVR work underway.
- Need to find out how we capture employee and customer feedback.
- FAQs have been mapped out on Miro.

Channel Shift (Internal comms): Faye is writing a comms piece which will be shared with AG on Thursday 26/09 to be published on Monday 30/09. LB also meeting with comms in broader terms.

KH to arrange regular meetings with Rob and TMs regarding channel shift (until 8 October).

26 Sept 24

Channel Shift

- Meetings scheduled with TM's to ensure we progress with timeline items.

- Internal comms will be completed today; this will be shared before 11 October.

- Customer entry points into the ICO mapped on MIRO, this will be shared with Faye's team.

8 Oct 24

Channel Shift

- Met with comms yesterday, discussed FAQs for ET and NEDs. The group discussed whether they require this information. LL agreed that this is deemed as unnecessary at present.

- Point raised regarding NEDs receiving email complaints – CH to give Laura Tomlinson the heads up regarding this.

- DSIT comms discussed, LL to look into this further.

10 Oct 24

Channel Shift

- Business Services will be reduced to a single line for accessibility requirements -This will start from 9am tomorrow.

14 Oct 24

Channel Shift

- Acknowledged still work to be completed.

- FS to share update this Wednesday.

- Discussion on temps and recruitment agencies, considering presenting a case on preferred recruitment agency selection. This aligns with the Workforce Strategy project.

- KHa conducted a successful SI workshop, evaluating effectiveness and areas for improvement.

ET informal 7 October- Key notes and Actions

DP transformation – high level overview

Channel shifting

Highlighting the 3 month trial of the business services channel shift to self serve online, then via live chat before arranging a call back. Confirmed EQIA completed and option to call direct for advice remains in the call filtering system.

DP Fees Optimization project
Re-prioritising work in Business Services using channel shift

Executive summary

- We temporarily need to create additional capacity to deal with increased DP Fees work.

- We will use channel shift to encourage an 'online first' enquiry service for organisations with non-fees related enquiries.

- One size doesn't fit all, so we are introducing a staged approach to deal with enquiries of different levels of complexity and customers with different levels of expertise.

- Through seeking detailed feedback, the initiative will help inform the way the ICO implements its automation strategy for its high volume, demand led customer services in the future.

The challenge

In October 2024, Business Services will send around 50,000 NoIs (Notices of Intent to serve a monetary penalty). This is far more than we would usually send, but is expected to raise £776k - £1.2m.

We will simultaneously be dealing with a large amount of acquisitions responses (sending over one million letters in September and October alone), to contribute to the expected income of £578k - £1.9m.

The solution

For the next three months we are running a pilot channel shift solution for business advice.

Instead of using our general advice line as the first line of response, we will encourage more organisations to find the answers they need online through the guidance and tools we currently provide plus some additional tools that are in production. This will support over 6,000 non-fees related contacts.

We are using automation to maximise our technical capability to free up colleagues for priority work, in line with our Workforce Strategy.

The detail

Our online tools won't answer every question, so we will introduce a new staged process:

- Customers with simpler questions and/or more experience in information rights will be able to self-serve online.

- Customers who can't find their answer online, will be invited to start a live chat with a Business Services colleague.

- If our colleague feels a more personal touch is needed to resolve the matter, they will offer to call the customer immediately.

- Customers who are unable to use online tools effectively and need a service adjustment under the Equality Act will still be able to speak to a staff member by phone as the first option.

This initiative has full project support with the project team providing advice and support to all teams affected (directly or indirectly) and will measure impacts and provide regular effectiveness reports. We retain the option to roll back the changes if necessary.

The future

This initiative will serve as a pilot to help inform our future thinking on automation as we know there are opportunities to automate some of our work in the Customer Services Directorate.

We will therefore gather detailed feedback from affected customers and colleagues to see what has worked well, what hasn't and what we can do better. And we'll use this to inform our ongoing journey towards increased automation.

High Level plan for Channel shifting Business Advice Customers to self-serve.

Faye Spencer, Project Lead, Katie Hulme, Project Manager

From 1 October, we will be channel shifting our Business Advice customers who contact us via the helpline with an enquiry onto the ICO website, so that they start their enquiry journey via self-serve.

We will be running this as an agile test and learn pilot for up to three months, and we will use feedback from our customers throughout the pilot, to improve the experience by taking an iterative approach.

For the pilot we will remove the inbound Business and PDB advice lines, and update the IVR script, so it signposts customers to the ICO website. Customers will still be supported by a small number of ICO case officers who will be active on live chat. If a customer has a particularly technical enquiry, the Live chat agent will ask the customer for their telephone number and make an outbound call to resolve their enquiry.

Allowing for accessibility needs we will direct customer on the IVR accordingly.

To ensure we are ready for 'go live' we will need to develop a detailed plan to cover the following activities:

1. **Develop improved customer journeys on our website.** This will include the development of tools to help customers identify the guidance they need. The tools will ask the customer a series of questions to help guide the customer in the right direction and help them navigate through our guidance library. We will start this with the SAR guidance and will have this ready for October. Adding further topics to the tool in iterative stages post 'go live'. The tool will have a feedback mechanism, so that we can collate and use user feedback to help inform future iterations.
2. **Ensure that the 'Contact Us' page is updated to drive self-serve.**
3. **Update our IVR for October, directing all Business Advice callers to the ICO website.**
4. **Ensure we have an internal comms plan, which includes updating our staff and TU.**
5. **Ensure we conduct an EQIA review to ensure customers with reasonable adjustment needs can access our services.**
6. **Ensure we have an external comms plan** to support 'go live', messaging to our customers that we are starting our services online. The messaging needs to promote our all of the guidance, tools and help available online.
7. **Ensure we map out all entry points across the ICO** incase we see Business callers telephoning random lines. To ensure we capture data on the number of calls and why the customer didn't get the help they needed on the website, we will need to develop a script for call agents to have ready so that we capture customer feedback.
8. **Ensure mobile device compatibility.**
9. **Develop a contingency plan (option 2), which we have ready to deploy, if needed.** This would include continuing to promote our self-service route but turning the inbound line back on with a small team of call handlers. We would deploy this if we saw unwieldy numbers of rogue calls going to other ICO lines, and/or the feedback we get through the new online tools indicates that we aren't meeting our customer's needs.

Equality Impact Assessment (EqIA)

This document fulfils the ICO's requirements to conduct Equality Impact Assessments, as a requirement to have due regard under the Equality Act 2010, S75 of the Northern Ireland Act 1998 and the public sector equality duty. This document helps you to assess the equality relevance of a policy or procedure on one or more groups of people with protected characteristics. Guidance is also available for Equality Impact Assessments (EqIAs), along with a glossary of issues to consider. The purpose of an EqIA is to ensure that equality issues are identified and mitigated. The guidance and 'issues to consider' documents are intended to assist with this, but they are not a substitute for consultation with people with lived experienced of any of the protected characteristics. Therefore, you should, wherever appropriate, consult with the relevant EDI staff networks or other colleagues to discuss potential impacts.

You must read the guidance and glossary of issues to consider before completing the document.

Completed EqIAs will be published on the ICO's website.

Summary

Prepared by: Suzanne Gordon, Director of PADPCS

What is the title of this piece of work? Business Advice channel shift project

Briefly describe the overall purpose of this work. Aligned to the Customer Service Strategy and Workforce Strategy, we are exploring opportunities to do things differently, embracing a digital first approach. From 11 October 2024, for a three month period, we plan to run a pilot which will see our business advice customers who contact us via the helpline, as their first port of call, being channel shifted to the ICO website to start their journey there. Business Customers will be presented with

some additional digital tools to help them self-serve and there will be the option of emailing in complex enquiries or engaging with ICO staff via live chat, if they cannot find the information they are looking for. We will continue to operate live chat between the hours of 9am-5pm, and there will be the option of making an outbound call to the customer, if this approach would help resolve the enquiry.

For customers who require telephone contact because of accessibility needs, in line with the Equality Act, we will maintain a phone line open for them. We will do this by changing the IVR on the 0303 123 1113, so that there is an option for customers requiring a Reasonable Adjustment to stay on the line and an ICO case officer will help them resolve their enquiry.

Initial screening questions

Q1. Does this work relate to an ICO policy, procedure, working practice or anything broadly similar? This includes both current policies and new policies under development.

Please answer YES

*If you answer **No** to this question, you may not need to complete a EqIA.*

Q2. Is this work about the explanation of the laws which the ICO regulates, or about decisions to use or not use any of our regulatory powers (eg monetary penalties, enforcement notices, information notices etc)?

Please answer YES

*If you answer **No** to this question, you may not need to complete a EqIA.*

If you answered no to both Q1 and Q2, it is best practice to rationalise why there are no negative impacts to each protected characteristic in the table below.

Impact on people with protected characteristics

Q3. For each of the protected characteristics, you should consider whether there are any **positive impacts** for people with each characteristic and set those out in the table below. If you think there are any **negative impacts**, set those out in the table below **and** explain how you will fully mitigate those impacts. It is best practice to include three mitigations per negative impact. Sign off can only be done with a minimum of two mitigations. If you think there is no impact, please explain why you think that is the case.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
Religion or belief	No	
Race, nationality or cultural background	No	
Disabled people	Yes	Our ICO website is accessible, as are the new tools added to the website to help customers self-serve.

We will retain a helpline for customers with accessibility needs, (this will be an option on the main ICO helpline number 0303 123 |

Commented [SG1]: Katy, can we check with Hannah about accessibility of these new tools please!

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
		1113) so they can continue to access telephony services. Hearing impaired customers will be able to access the helpline telephony service, as they do currently: If they contact us via the phone and are deaf or have a hearing or speech impairment, they can use the free BT service Relay UK. They can install the free app on your smartphone, tablet, or computer, which you can access on your app store. Then our advice line on 0303 123 1113, Mon - Fri, 9am-5pm. The Relay UK service itself is free. Customers only pay your normal charges for the calls. If they want to use their textphone to contact us, they can dial 18001 followed by 0330 123 1113. Alternatively, they can also contact us using our live chat. All of this information related to hearing impaired customers is on the ICO website already.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
Sexual orientation	No	
Sex (see note 1)	No	
Age	No	
Gender reassignment (see note 2)	No	
Marital status	No	
Pregnancy and maternity	No	
Political opinions	No	
People with dependants	No	
People without dependants	No	
Socio-economic groups or social classes (see note 3)	No	
Multiple protected characteristics (see note 4)	No	

Note 1: you may also wish to consider gender while considering sex, although gender is not a protected characteristic under the Equality Act or s75 of the Northern Ireland Act 1998.

Note 2: you may wish to consider the impact on transgender people while considering the protected characteristic of gender reassignment. This includes if the person is proposing to undergo, is undergoing or has undergone a process.

Note 3: Socio-economic group or social class is not a protected characteristic, but we would still like to ensure that we consider the impact of our work in this area.

Note 4: Multiple protected characteristics is an opportunity to consider whether there are issues which affect people with most or all of the protected characteristics, or where there may be different impacts of the same issue on different characteristics (eg the same issue has a positive impact on people with one protected characteristic but a negative impact on people with another protected characteristic).

Q4. The ICO has a number of legal obligations in relation to the provision of Welsh language services. Is this work being delivered in Wales, or to the people of Wales, and if so will there be a need to consider the impact on the Welsh language?

Please answer Yes, No or Don't Know

*If you answer **Yes or Don't Know** to this question or would like further information, please contact the Welsh Regional office to discuss next steps via wales@ico.org.uk .*
@
Q5. In interests of best practice, you should consider whether this work may have a negative impact on or contravene any Human Rights. Click this link to the find an overview of each of the human rights and further details about each. The Human Rights Act itself is available at this link. Please confirm that you have considered this and set out any actions you will take to mitigate any impacts.

Answer: On the ICO website we already advertise our Welsh language service. The telephone number for this is 0330 414 6421 to talk to the team. There is also the facility the team in our Wales Office Email: wales@ico.org.uk

This project, will not impact on the Welsh language enquiry line.

What about the new self serve tools Faye? Will there be the option of using this in Welsh?

Contributing towards the ICO's equality objectives

Q6. How does this work contribute towards the ICO's equality objectives? Please explain contributions, state ways contribution could be increased, or state 'no contribution'.

Objective	Contribution to objective
Objective 1: **We will represent the communities and societies we serve** We believe that diverse teams make better decisions, boost creativity and innovation, enable greater professional growth and increase our understanding of the communities we regulate. As a workforce, we are the most effective and have the greatest impact when we are representative and consider different perspectives.	N/A for this change.
Objective 2: **Our culture will be inclusive** We're at our best when we support and look out for one another, and when we trust and empower each other to be ourselves. That applies whether it's within the workplace or in the work that we do. We have measures in place to support our diverse workforce, such as reasonable adjustments. However, we will do more to remove the barriers that are preventing people from developing and progressing.	In line with the Workforce Strategy, we need to ensure we have the right people, with the right skills, in the right place, at the right time. Across the later part of 2024, we need staff within Business Services to have the capacity to focus on a project to increase fee revenue, both through acquisition work and also the Notice of Intent project, where we are contacting 50,000 organisations who have previously paid the ICO registration fee, but are not currently paying the annual fee. To ensure we have the capacity and capability to deal with this fee work, we will adopt a digital first approach to supporting business customers who come to the ICO with an enquiry. We know through the ICS Business Benchmarking survey (2023) that ICO customers score the ICO website highly for content and usability. Therefore we want to reposition our service offering to our

Objective	Contribution to objective
	customers, so that Business Advice customer journey's start online, via self-serve. If a customer cannot find what they need online, there will be the option of live chat, email and outbound calls.
Objective 3: **We will better understand the needs of everyone to deliver services that are accessible to all** We target our regulatory interventions on the areas of greatest harm and to make a real difference to people's lives. Technological innovation by businesses means the landscape we regulate is constantly transforming. We know we're at our best when we understand the needs of all our customers, including those who experience vulnerability and communities of unmet need.	As part of this pilot, we will be ensuring that there are feedback mechanisms in place for staff and customers. This includes ensuring that any entry point to the ICO has mechanisms to collect feedback from customers if they decide they don't want to self-serve, or cannot find the help they need on-line. This feedback will be used to improve the services available both in an iterative way (during the pilot) and reflectively at the end of the pilot phase. We have contingency plans in place, if we need to revert to providing more telephony services and will assess the need for this weekly, as the pilot gets underway.

Monitoring and evaluation

Q7. What arrangements are in place, or will be put in place, to monitor and evaluate the impact of the work on equality?

> *Answer*: We are embedding feedback and insight gathering mechanisms as each ICO entry point. This includes the other telephony lines we operate, including the Welsh language line, and the media lines. We will ensure that all staff have access to a 'lines to take' document and proactively seek feedback from customers who chose to use an alternative path into the ICO rather than the digital first, self-serve approach we plan to pilot.

Commented [SG3]: Do we have this on our list for lines to take, feedback mechanisms etc?

Q8. How long will these arrangements be in place?

9

Answer: From 11 October for 3 months. These arrangements will then be reviewed to determine the success of the pilot and whether there is scope to roll this approach out on a more permanent basis, and potentially across other service areas.

Q9. When do you intend to review this EqIA? This should usually be done upon any change that is made to the original piece of work that this EqIA is for.

Answer: We will keep the EqiA document up to date. If we bring in any incremental changes during the pilot, we will update this form.

Publication

Q10. As stated above and in the guidance, we intend to publish all completed EqIAs on the ICO's website. Please provide detail of any necessary redactions and the intended publication date.

You should also review the wording to ensure that it is as clear as possible for any staff or public to read.

Answer: This form can be published with no redaction.

Governance and sign-off

The person who completes this document must be content that all potential equality issues have been identified and considered, that appropriate monitoring will be in place and the publication issues have been considered.

Please tick here to confirm that you have consulted with other colleagues and those it would largely impact where appropriate. ☒

Please state here who has completed the EqIA:

Signed by: Suzanne Gordon *Date: 2 October 2024*

Approved by line manager:

Signed by: *Date:*

You **must** send your completed form to corporategovernance@ico.org.uk for storage and publication.

The EDI Board provides overall assurance that the EqIA process is operating effectively, but it is not for them to review or approve EqIAs.

If you have identified any negative impacts to any protected characteristics that you cannot fully mitigate, please contact Inclusion and Wellbeing for advice via inclusionandwellbeingteam@ico.org.uk.

Section 75 The Northern Ireland Act

To meet the NI section 75 consultation requirement, we must incorporate the following into our EqIA process. Please read through the below and implement as appropriate whilst completing your EqIA

1. We will externally publish a list of all EqIA screenings we complete. We should publish these quarterly. The spreadsheet will be 'housed' on the ICO website Equality and diversity | ICO (these will include **all** EqIA screenings we complete)

2. Where an EqIA screen results in the need for a full EqIA on a policy, procedure or change that relates directly to the ICO carrying out its external statutory functions; we will consult with key stakeholders at the earliest opportunity for 12 weeks. By law we must consult with the Northern Ireland stakeholder list, but good practice would be to include other relevant stakeholders from across the UK. The author/approval manager will be best places to determine who these should be.

3. We have clarified that if we don't receive a response from these stakeholders to a consultation, that is fine. We record no response and move on with the policy, procedure or change.

4. We have clarified that we do not need to consult under s75 for policies that only impact our staff. Whilst its good practice to consult with staff, TU etc about changes that impact employees, ways of working etc, this type of internal change would not engage s75. We should of course complete an EqIA at the earliest opportunity, it's just that the s75 consultation requirement is unlikely to be engaged.

5. We have agreed that it would be for the manager who approves the EqIA to determine if a s75 consultation is needed. The Inclusion and Wellbeing team can provide support, but the author and manager will know their business area and will be best placed to assess if a new/change to a policy impacts external customer and stakeholders as part of our statutory function and should therefore be consulted on.
6. We have agreed that it should be for the author/approving manager to send the EqIA screening form or full EQIA form to corporate governance.

EqIA version control (to be updated by the person completing the EqIA)

Version number	
Status	
Relevant or related policies	Equality Impact Assessment Guidance
Author/owner	
Approved by	
Date of sign off	
Review date	

Version	Changes made	Date	Made by

Template version control (to be updated by the person updating the EqIA template)

Version number	2.4
Status	Not approved
Relevant or related policies	Equality Impact Assessment Guidance
Author/owner	EDI Board (EqIA sub group)
Approved by	Suzanne Gordon
Date of sign off	10 February 2023
Review date	February 2024

Version	Changes made	Date	Made by
0.1	Created new document.	June 2021	Chris Braithwaite
0.2	Amendment of title to EqIA and minor amendments	July 2021	Chris Braithwaite
0.2a	Amended to put protected characteristics and objectives into a table as an option to consider	July 2021	Chris Braithwaite
0.3	Added wording in relation to publishing the EqIA	August 2021	Chris Braithwaite
1.0	Links added and approved	September 2021	Chris Braithwaite
2.0	Reviewed form and process	8 August 2022	DOC, AT, JT, RS (IWT)
2.1	DOC added in sections and review of content	28 August	DOC
2.2	Amended changes after collaboration and feedback from the EDI Steering Group	30 August 2022	IWT
2.3	Updated to include best practice consideration of the Human Rights act	26 January 2023	Chris Braithwaite
2.4	Updated to include EDI objectives	6 September 2023	Roshini Mylvaganam