



## Business advice channel shift

Account manager:	Social lead: Lisa Tighe Press lead, from 23 September: Lucy Milburn Web lead: Lucy Turner Web support for DDaT (Lucy/team - dependent on capacity) Design: Louise Murphy
Strategic lead:	Claire Harris (contact Tim Bowden until 8 October)
Sign off trail:	Angela Balakrishnan, Executive Director – Strategic Communications and Public Affairs  Faye Spencer, Head of Business Services (to liaise with Louise Locke, Executive Director if required) Coordinate sign off via Katy Hulme, Project Manager

## Objectives and key messages

### Objectives

#### Overall project

Support a smooth transition away from helpline services to online, specifically:

- Protect the reputation of the ICO during the transition
- Ensure service users with accessibility needs are informed about how they can access support
- Drive users towards alternative services (eg live chat and online resources)

#### Phase 1 (initial launch)

- Ensure information about the transition is available on our channels to maintain openness and transparency
- Deliver clear and consistent messaging that positions the ICO as being an enabler of business
- Gather actionable insight to inform future phases of activity (specifically on messaging and communication channels)

#### Phase 2 (longer term business support)

- Promote the high-quality online offer the ICO provides for the DP fee, to empower businesses to get data protection right
- Help to drive the desired behaviour change, using insight to focus on those ICO tools that address the most common issues raised by callers to the helpline
- Drive positive sentiment / mitigate negative sentiment about future service changes, by positioning them as part of the ICO's commitment to continuously improve

## High level key messages

- These changes reflect the ICO's move towards a modern service that provides simple but comprehensive online tools that give businesses the certainty they need.
- We understand that this is a different approach, but directing our resources to improving our online tools and resources will give businesses instant access to the ICO's advice and expertise 24/7.
- We are committed to making compliance with data protection law as easy as possible for small businesses, supporting them to grow through the responsible use of information.

## Scoring/evaluation

### Metrics for overall project

- **Objective 1:** Protect the reputation of the ICO during the transition.
  - 65% of all engagement via stakeholders, web, press and social media to be positive, balanced or neutral in tone.
- **Objective 2:** Ensure service users with accessibility needs are informed about how they can access support.
  - Complaints relating to service accessibility (both direct and across social) to remain at comparable levels to the pre-transition period.
- **Objective 3:** Drive users towards alternative services (eg live chat and online resources)
  - Increase in visits to signposted online services (specifically information on SARs, direct marketing and personal data breaches).
  - Increase in users of live chat services.
  - Reduction in overall call volumes (ie users aren't simply using other options to access helpline support).

### Metrics for Phase 1 objectives (initial launch)

- **Objective 1:** Ensure information about the transition is available on our channels to maintain openness and transparency.
  - Information to be posted on website homepage and contact us page
  - Less than 10% of inbound enquiries about business advice to suggest that the ICO hadn't been open or transparent about the change.
- **Objective 2:** Deliver clear and consistent messaging that positions the ICO as being an enabler of business.
  - 90% of proactively issued content to include at least one of our high-level key messages about supporting businesses.
  - Less than 50% of reaction on social media to indicate that the ICO does not offer adequate support to businesses.
- **Objective 3:** Gather actionable insight to inform future phases of activity (specifically on messaging and communication channels).
  - List of actionable insights produced following phase 1 roll-out.
  - At least 50% of recommendations to be actioned in phase two communications activity.

## Metrics for Phase 2 objectives (longer term business support)

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### Audiences and insight

#### Background

From **11 October** there will be noticeable changes to the way the ICO provides advice to business customers.

This 'channel shift' is necessary to redirect Business Advice Services (BAS) resource to where it is needed the most, primarily work to support data protection fee acquisition (payments and penalties).

Currently, callers to the ICO helpline (0303 123 1113) can choose from three options:

1. Data protection fee and registration advice
2. Advice for the organisation you work for
3. Member of the public

Option 2 will be removed and callers will be guided to the ICO website to start their enquiry through self-service.

A small number of additional case officers will be moved to the website's live chat. If a customer has a particularly technical enquiry, the chat agent will ask for their telephone number and make an outbound call to resolve their enquiry.

People with accessibility needs (for example, people unable go online) will be directed by recorded message – BAS is putting this in place.

This approach will be tested for up to **three months** and feedback gathered to understand the customer experience and help improve it through iterative changes.

There is a contingency plan (which BAS will lead on) that would turn the inbound call line back on (reinstate option 2) with a small team of call handlers. Promotion of self service would continue. This plan will be enacted if an unwieldy number of calls was going to other ICO lines or feedback indicates that we aren't meeting our customer's needs.

## Audiences

### Phase 1:

- Businesses already engaged with the ICO, who are most likely to perceive the changes

### Phase 2:

- To be developed drawing on insight from phase 1

## Insight

We know that the most common reasons for calling the helpline are for advice on:

- SARs – confusion over timeframes (eg getting confused with FOI, working days vs calendar days), is a request valid or is there a reason not to reply
- Direct marketing
- Personal data breaches – 66% of calls relate to we've had a breach/does it need reporting/how do we assess if it meets the threshold to report. Only 28% of callers to the PDB advice line have consulted the online guidance before calling (data recorded since April 2024)

BAS is working with DDaT to develop improved customer journeys on the website in these areas, including tools that will ask the customer questions to help them navigate through our guidance library. SARs guidance has been prioritised. The tool will have a feedback mechanism so that user feedback can inform future iterations, and will be developed for other topics in future.

**We can bring in other existing, or in-development tools, under the self-service banner, and the wider pro-businesses messaging to showcase how the ICO uses the DP fee to help businesses cut the cost of compliance and enable responsible innovation and economic growth.** Including:

- A new direct marketing click-thinking tool that will give a clear answer on electronic marketing questions/practices (launched at the start of October)
- The recently launched privacy notice generators
- Redesigned small organisations area on the website, making it easier to find what you need [in progress, timeframes TBC]
- A new SARS self-serve tool
- Anything else we already have that we can bring in here? Self-assessment checklists?

## Risks and mitigations

**Risk:** The changes are happening quickly and with little warning, which could leave businesses confused and frustrated. **Mitigation:** The ICO will take a proactive approach to announcing the changes and will be open and transparent about the reasons. The information will be shared before the changes take place and provide reassurance that businesses will continue to be able to access the support they need.

**Risk:** The changes are happening at a time when DSIT is proposing to increase the cost of the DP fee. The perception could be that the ICO is cutting services while putting up the cost of compliance. **Mitigation:** We will demonstrate that the ICO, and the DP fee, offers value for money by showcasing the wide range of resources that businesses can already access for free, and the new tools that are continually being developed.

**Risk:** Other ICO phone numbers could be used as an alternative route for people seeking business advice, impacting other ICO services. **Mitigation:** BAS will monitor phone traffic to other public facing ICO numbers to track whether businesses are using other avenues to get in touch by phone. A contingency plan is in place should enquiries via other numbers become unmanageable.

**Risk:** Accessibility issues for people that cannot use online services and potentially excluding certain groups from being able to access and use a public service.

**Mitigation:** BAS will conduct an EQIA to ensure customers that need reasonable adjustments can still access services. An option will be included on the helpline options to ensure access is still available.

**Risk:** Online services do not meet user need and prompt complaints or additional calls from frustrated customers, which could also be shared online and cause reputational damage. **Mitigation:** BAS will capture data on the number of business advice calls and why the customer didn't get the help they needed on the website to help adapt content. A feedback mechanism will also be available as new tools are introduced to help inform future iterations. Comms will monitor web feedback for any comments specifically related to business advice content.

**Risk:** Key stakeholders want to know why they weren't told about or consulted on the changes. **Mitigation:** A proactive comms approach provides prior notification of the changes to already-engaged customers.

BAS has confirmed it will not be doing proactive stakeholder engagement prior to the changes, which could cause us to lose control of the message, could cause

unnecessary concern in advance, and could appear to be abdicating responsibility for sharing the information with businesses and expecting stakeholders to do it.

**Risk:** Staff in BAS are concerned by the new approach and the change to their role.

**Mitigation:** No comms, internal or external, will happen until trade unions have been consulted and staff informed. Internal Comms Business Partner Mandy O'Reilly is supporting the project and a clear narrative will explain how the move supports the ICO's wider priorities and objectives. **Note:** content in our FAQs (for external use) must be consistent with any internal comms that cover the same themes, in edited form where appropriate (eg for brevity or to omit information that is for internal use only).

## Strategy/idea

This is a long-term piece of work that will take a phased approach to tell the story of the service we provide to businesses. Phase 1 is to communicate the service changes happening from 11 October 2024.

### Phase 1 – launch of changes

#### Web:

We'll be:

- publishing a statement on the ICO website and updating the contact us page
- There will be no proactive comms on other channels at this stage.

This will announce the date of the upcoming change, acknowledging that businesses may find the new system a change but provide reassurance that the ICO is still here to help and provide a high-quality service

#### Press and social

Agree reactive FAQs and lines to take about the changes and use these to answer questions directed at the ICO through our channels or the media: see [Draft FAQs doc](#)

### Phase 2 – wider campaign to promote online resources

#### Press

To be added closer to time.

#### Social proactive

We'll run a "**self-service social media campaign**" until the end of 2024 that covers the most common reasons for calling the helpline: SARs, Direct Marketing and

PDBs. The messaging will be around how orgs can reassure themselves that they've interpreted guidance correctly. This will focus on **Twitter and Facebook**.

We'll run a social media campaign on our owned **Twitter and Facebook** that focuses on **the tools that that ICO has created that saves businesses time and money**, such as the direct marketing tool, and existing support such as the privacy notice generators.

### **Social reactive/intel**

We'll use the LTTs where appropriate and track replies received, sentiment and conversation to see how this has landed.

### **Web**

The team will:

- monitor the internal site search terms to ensure that the right pages are appearing.
- Look at SEO terms and Google trends and add keywords to text where relevant to ensure that the right ICO pages are appearing.

### **Optional proactive social and digital**

If there's available resource the team may also:

- Explore if we can set up **an automated 6-week newsletter** on improving SAR compliance with steps orgs can take each week.
- Look at creating some short business focussed **Facebook reels** and **YouTube Shorts** that mirror the content from the "**self-service social media campaign**"
- Look at improving the SEO and search terms of existing **YouTube videos** to maximise existing content to reassure and help users understand the law.

## Final results (Impact)

[To be added by communications team once all activity has been completed]

Communications objective	Outputs (eg what did you create or put out media coverage, social posts, blogs, web content)	Audience outtakes (eg how did people react to the outputs - engagement rate, shares, likes, comments, downloads, web visits)	Impact (ie evidence that the objective was achieved)
[Objective 1]			
[Objective 2]			
[Objective 3]			

## Comms planning tools

### Implementation plan

Timing	Action	Owner – a/c manager to make sure this happens	Notes
Sep/Oct	Sign off for comms approach	Louise / Faye	
"	sign off for key messages, FAQs and LTT	Louise / Faye	
"	Direct comms to affected BAS staff	Internal comms / Louise / Faye	
3 October	Post internal news story	Internal comms	
tbc	Stakeholder comms??	BAS has confirmed no prior engagement	
October	Post statement on ICO website	Comms	Now 9 October
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October tbc	First evaluation review	Comms	
October tbc	Launch of phase 2 - first iteration of campaign to promote online resources	Claire	

### Campaign tasks and responsibilities list

This is a [basic checklist of things to do](#) and people to tell during the planning and delivery of a comms campaign or project.

#### Internal audience list

Business Advice Service Managers,

Public Affairs Data Protection Complaints Service (PADPCS) Team Managers,

PADPCS Group Managers



Internal comms,  
Public Affairs,  
ICOR,  
Relevant PACE team



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#### Phase 2 (longer term business support)

- Promote the high-quality online offer the ICO provides for the DP fee, to empower businesses to get data protection right
- Help to drive the desired behaviour change, using insight to focus on those ICO tools that address the most common issues raised by callers to the helpline
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### **Metrics for Phase 2 objectives (longer term business support)**

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## Audiences and insight

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Commented [KB1]: Just checking if the SAR tool should be referenced here, [@Lucy Turner](#) ?

Commented [LT2R1]: [@Kate Banks](#) Yes I think the SAR self serve tool should probably be mentioned here

## Risks and mitigations

**Risk:** The changes are happening quickly and with little warning, which could leave businesses confused and frustrated. **Mitigation:** The ICO will take a proactive approach to announcing the changes and will be open and transparent about the reasons. The information will be shared before the changes take place and provide reassurance that businesses will continue to be able to access the support they need.

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Commented [LT3]: @Lucy Turner - just wanted to check you're happy with this.

Commented [LT4R3]: @Lisa Tighe Yes, that looks perfect to me, thanks.

**Final results (Impact)**

[To be added by communications team once all activity has been completed]

Communications objective	Outputs (eg what did you create or put out media coverage, social posts, blogs, web content)	Audience outtakes (eg how did people react to the outputs - engagement rate, shares, likes, comments, downloads, web visits)	Impact (ie evidence that the objective was achieved)
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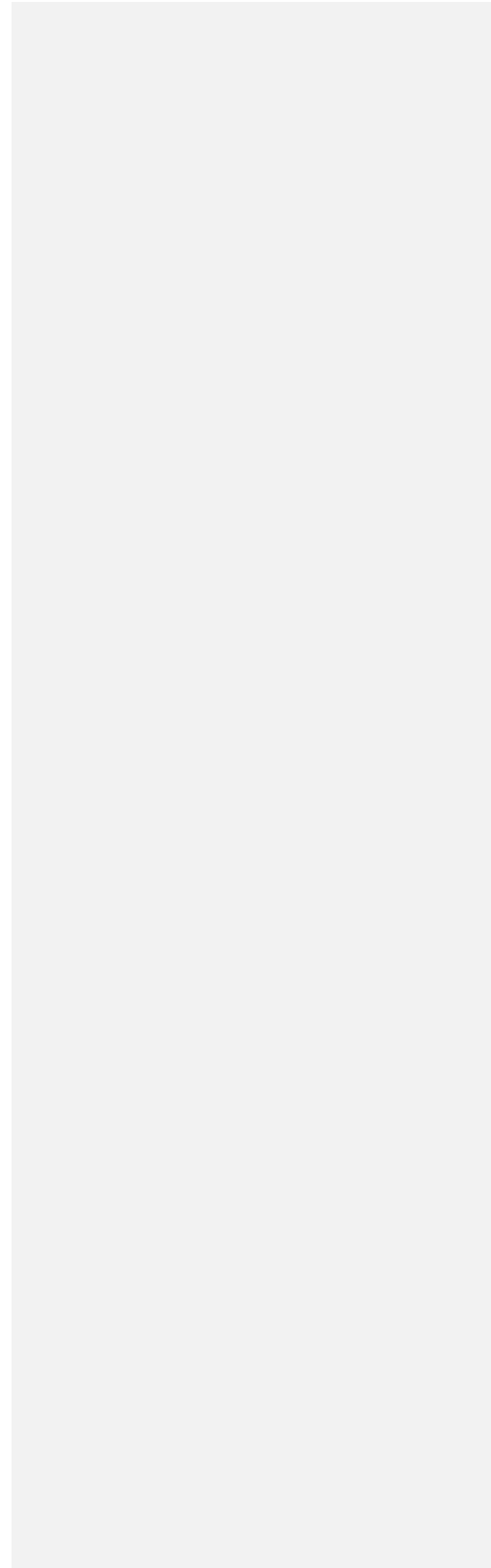
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Corporate Communications :: Communications plan

Internal comms,  
Public Affairs,  
ICOR,  
Relevant PACE team



							Risk Management												
		Risk Estimation			Risk Evaluation														
ID	Date raised	Description (including cause, threat, impact)	Owner	Gross risk - without any treatment			Response	Existing controls/actions	Current risk score - with existing treatment - <b>USE THIS ON PSR</b>			Planned controls/actions	Target risk - once all controls/actions completed			Direction of travel since last update	Comments/interdependencies	Status	Date mitigation updated
				Likelihood (1-5)	Impact (1-5)	Score			Likelihood (1-5)	Impact (1-5)	Score		Likelihood (1-5)	Impact (1-5)	Score				

Project-outbound	18-Sep-24	<b>Channel Shift work:</b> There is a risk that when level C staff from BAS start doing work to support Payment and Penalties, thus work is level D work. Meaning there is a pay disparity.		FS	5	4	<b>20</b>	Treat	Work in progress to give clear guidance on clear boundaries between done by level C and D colleagues.	4	3	<b>12</b>							
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Project-Outbound	01-Oct-24	There is a risk that due to the channel shift. There will be an increase in cases and less resource to progress casework. This will mean that SLA's will be impacted and there is a likelihood of increased complaints. This has a reputational risk and decreased customer satisfaction.	FS	4	5	20	Treat	Raise awareness that this may come up and that the corporate scorecard may track red for the quarter. Monitor impact on a regular basis.	3	4	12	Developing self serve tools on the wesbite. We can stop activities at any point	0				
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Project-inbound	26/07/2024	<p><b>Staff mobilisation:</b> There is insufficient capacity to cope with the additional work generated by the programme, coupled with a recruitment freeze (cause). This puts pressure on how we mobilise resources to support fee income, and we can't cope with the increase in demand created by the programme (impact). This results in low staff morale/wellbeing, dissatisfied customers, an increase in payment failures and reputational damage (consequence)</p> <p><b>Supporting Information:</b> Staff mobilisation is split between projects, DP</p>	Suzanne Gordon	3	4	1 2	Treat	> The management of this risk is recognised as having an inter-dependency with the Outbound project and Fee Finder (KH).	3	4	1 2	<p>&gt; (Outbound) A mobilisation plan will be published with options and recommendations for different scenarios based on Fee Finder information. &gt; (Outbound) Update 29/08 NOIs: As part of staff mobilisation, ways to help manage incoming calls to the payments and penalties team are being explored. Email communications to the NOI backlog are planned for October 24. Members of business services need to be trained to help answer resulting calls for a period of three months and we will be channel shifting business customers to start their journey</p>	3	3	9				
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		<b>Fees (Outbound) Legal and Finance (Inbound).</b>  <b>It is acknowledged that the scope could be Programme level.</b>								online/self serve. > (Inbound) We have identified potential capacity challenges relating to the MPN process for Finance and Legal colleagues. Workshop planning is underway to understand the as is journey and develop a collaborative solution, with all key stakeholders.					
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**NOTE \*\*Terms of reference should be consulted to ensure decisions are made within agreed delegated authority limits for the project\*\***  
**Decisions from each milestone review, and each PRL review should be logged (examples below)**

<i>Unique identifier number</i>	<i>Name of supporting paper and/or meeting</i>	<i>Short title for the topic area</i>	<i>Description of the decision requested and the outcome</i>	<i>Name of decision requestor</i>	<i>Name of individual or governing body that made the decision</i>	<i>Date of original request</i>	<i>Programme or project level decision</i>	<i>Date that the final approval/ decision was made</i>	<i>Agreed(or Approved), Indicative, Pending</i>
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12	Email 29 Aug 24	Staff mobilisation	As part of mobilisation planning, a decision was reached about how calls to the payments and penalties team will be managed, once we send out bulk communications to the NOI backlog. Members of business services need to be trained to help support an increase in calls to the ICO. So the decision has been made to divert resources and manage requests for call backs for a period of three months so they can support fully. This work is anticipated in October, but will happen when the e-	Programme Manager (LB)	Project Sponsor (FS)	29- Aug- 24	Project	29- Aug- 24	Agreed	29/08: Associated actions are recorded in the definition of done for NOIs to the backlog
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			mail NOIs are ready to go								
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# 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 experience 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

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.
		<p>1113) so they can continue to access telephony services.</p> <p>Hearing impaired customers will be able to access the helpline telephony service, as they do currently:</p> <p>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.</p> <p>The Relay UK service itself is free. Customers only pay your normal charges for the calls.</p> <p>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.</p> <p>All of this information related to hearing impaired customers is on the ICO website already.</p>

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

*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](mailto: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 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 to contact the team in our Wales Office Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

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

## 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
<p>Objective 1: <b>We will represent the communities and societies we serve</b></p> <p>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.</p>	<p>N/A for this change.</p>
<p>Objective 2: <b>Our culture will be inclusive</b></p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>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.</p> <p>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</p>



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.
<p>Objective 3: <b>We will better understand the needs of everyone to deliver services that are accessible to all</b></p> <p>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.</p>	<p>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.</p> <p>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.</p>

## 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. We are gathering feedback through agents on livechat and ICO telephone line using MS forms and smart survey.

Q8. How long will these arrangements be in place?

*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](mailto: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](mailto: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

