

Annual Equality Information Publication

January 2020

Part 1: Introduction to the ICO and this report

About the ICO

The Information Commissioner's Office (ICO) is the UK's independent public body set up to promote access to official information and protect personal information. This is achieved by promoting good practice, ruling on complaints, providing information to individuals and organisations and taking appropriate action when the law is broken.

Our mission is to uphold information rights for the UK public in the digital age.

Our vision is to increase the confidence that the UK public have in organisations that process personal data and those which are responsible for making public information available.

A significant part of our role is to be responsible for the enforcement of the Data Protection Act, Freedom of Information Act, the Privacy and Electronic Communications Regulations and the Environmental Information Regulations.

The **Data Protection Act 2018** gives citizens important rights, including the right to know what information is held about them and the right to correct information that is wrong. It helps to protect the interests of individuals by obliging organisations to manage the information they hold securely, and gives the ICO the power to take enforcement action organisations who mismanage or abuse personal data.

The **Freedom of Information Act 2000** gives people a general right of access to information held by public authorities. Aimed at promoting a culture of openness and accountability across the public sector, it enables a better understanding of how public authorities carry out their duties, why they make the decisions they do and how they spend public money.

The **Environmental Information Regulations 2004** provide an additional means of access for people who want

environmental information. The regulations cover more organisations than the Freedom of Information Act, including some private sector bodies.

The **Privacy and Electronic Communications Regulations 2003** support the Data Protection Act by regulating the use of electronic communications used for the purpose of marketing to individuals and organisations.

The ICO also has responsibilities for other regulations including aspects of the INSPIRE regulations, the Re-Use of Public Sector Information Regulations, and the Electronic Identification and Trust Services for Electronic Transactions Regulations.

The ICO is a UK wide organisation and we are committed to appropriately meeting the diverse needs of our many stakeholders and users of our services. We also wish to ensure that we provide an inclusive, diverse and fair working environment for our employees in England, Wales, Scotland and Northern Ireland.

About this report

The ICO is a public authority and is subject to the Public Sector Equality Duty. This means that the ICO is required to publish information to demonstrate what we have done to help eliminate unlawful discrimination, advance equality of opportunity and foster good relations between people. We are also obliged to publish equality data concerning our staffing.

These obligations are called 'specific duties' of the Equality Act 2010. This report is written to fulfil those duties and to help people and organisations assess the ICO's performance with a focus on equality matters during 2019.

We want to continually improve our equality performance. We hope that the report demonstrates that equality is integral to our activities, decision making and the effective promotion of information rights.

Our Equality Objectives 2019-22

The ICO is committed to enhancing equality and diversity in all of our work. We want to be an effective and accessible regulator, service provider and employer.

To help focus our activities to achieve this, we have developed Equality Objectives. This is also part of our obligations as a public authority arising from the Equality Act 2010.

In the period from 2019 to 2022, the ICO commits to take actions to achieve the objectives outlined below:

Spreading knowledge and taking action

We will raise awareness of information rights across the community and take action to ensure that organisations fulfil their obligations. We will have particular focus on groups and sectors where knowledge gaps may cause information rights inequalities or vulnerabilities. We will ensure that in our actions as a regulator we do not create inequalities or unlawfully discriminate.

Accessible services

Our services and information will be accessible for users and potential users of our services, and we will provide our staff with the skills and knowledge they need to provide high quality services for all. We will try to anticipate customer needs and we will take action to remove barriers to our services when possible.

Encouraging others

We will use our status as a regulator, advisory body and purchaser of services to influence improvements in equality by other organisations and across society.

Employer

Our workplaces and practices will be accessible, flexible, fair and inclusive. We will value the diversity, skills, backgrounds and experience of our people, enabling them to perform to their best in a welcoming and supportive environment.

Equality, Diversity and Inclusion Forum and EDI Network Groups

To help us monitor our progress towards fulfilling our Equality Objectives, we have an Equality, Diversity and Inclusion (EDI) Forum.

The Forum's role is to support and advise the organisation in our efforts to achieve our objectives and help us to implement good equalities practice.

The Forum is made up staff who lead internal networks which represent the interests, views and insights of various groups of people including those with protected characteristics. All staff are able to participate in a network if they wish, regardless of grade or their department.

The Forum and Networks provide support and expertise, but it is important that they are not regarded as the main 'owner' for equality initiatives. We wish to embed equality and diversity in the operational work of the ICO with local accountability resting with relevant departmental and project / activity leads, with involvement from staff across the organisation.

During 2019/20 we reviewed our Equality and Diversity governance structure which created the networks which we now have, as well as the Forum.

This enables the network groups to feedback and help us to improve the connection of our diversity groups to strategic decision making.

Report structure

The next part of this report provides information about the ICO's staffing including the demographics of our staff and pay equality data.

We also provide information about the training provided to our staff which helps them to provide better services to the public.

The final part of this report provides more detailed information about actions which have impacted upon our performance on equalities, diversity and good relations.

Part 2

Equality Information and the duty

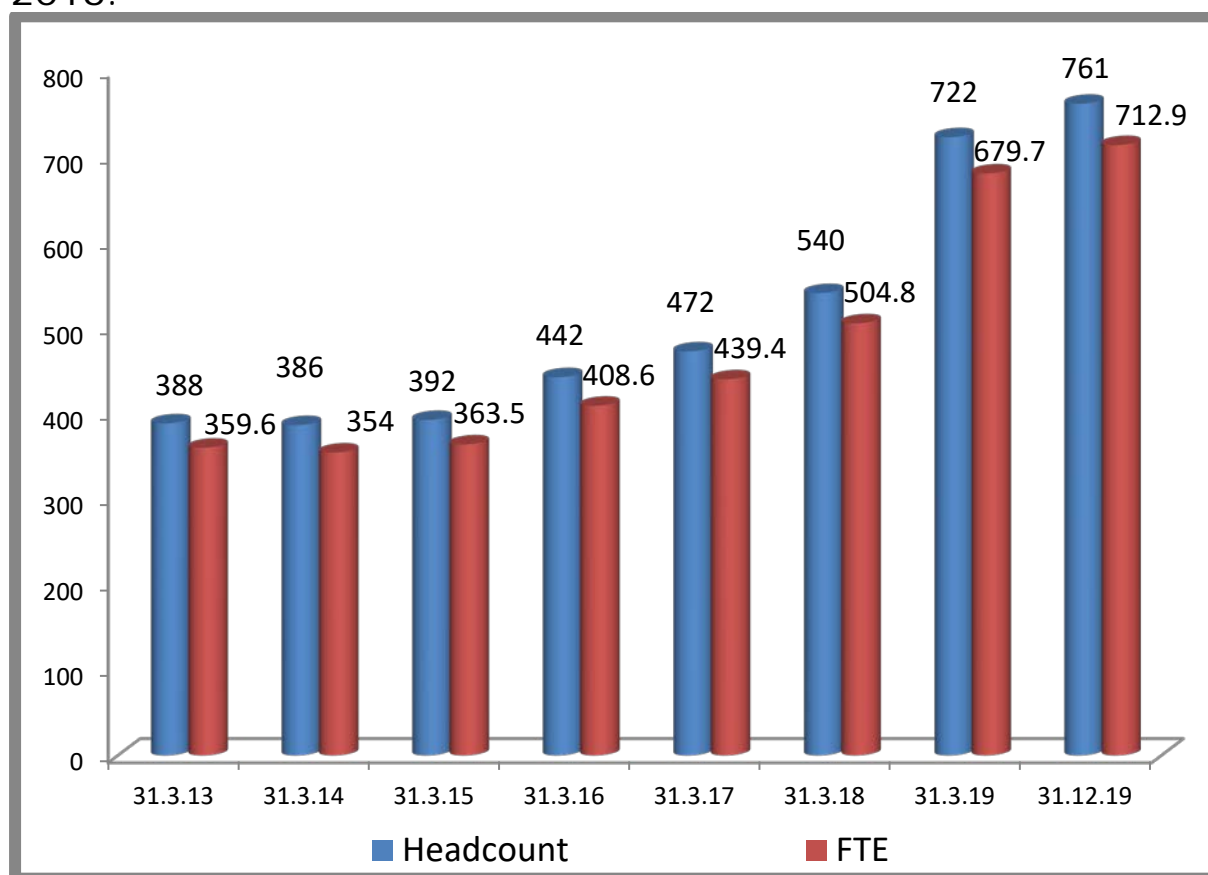
This part of this report provides statistical information about the characteristics of our staff.

Data therefore reflects information as at 31 December 2019.

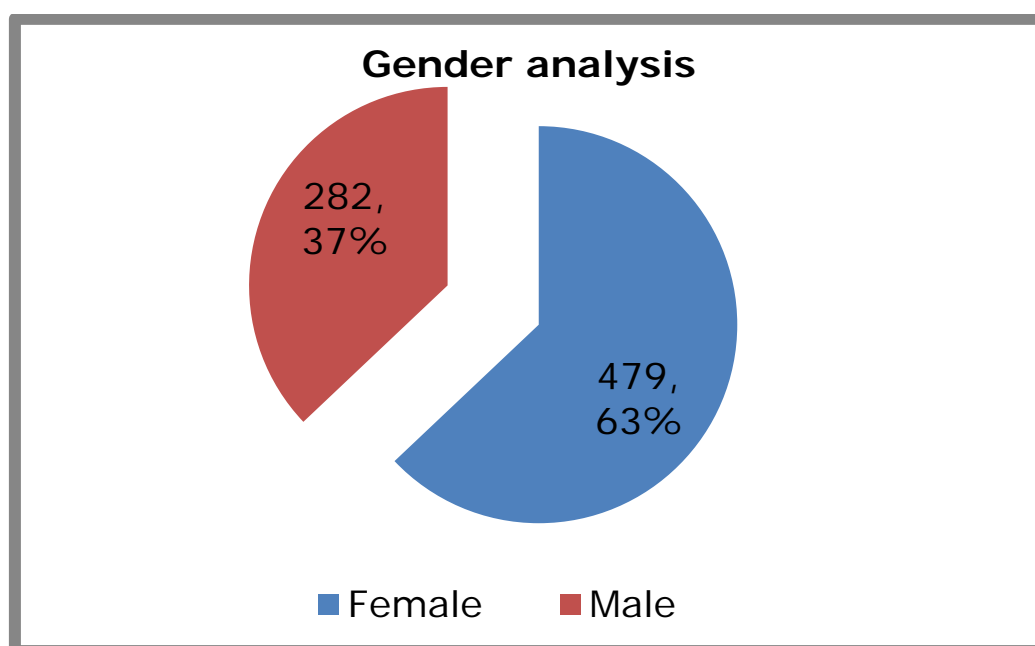
2.1 Total Headcount and FTE (established staff)

The ICO had 761 staff, which represents a full time equivalent staffing of 712.9 posts.

The organisation's staffing has grown by 72% since March 2016.



2.2 Gender analysis



2.3 Staffing by grade

Job Level	No. of staff	% of staff
B	44	5.8%
C	161	21.2%
D	215	28.3%
E	176	23.1%
F	115	15.1%
G	32	4.2%
G2	14	1.8%
H*	4	0.5%

* Level H is the ICO's most senior grade. The data does not include the Commissioner as she is not an employee of the ICO.

2.4 Grade breakdown by gender

Job Level	% of grade female	% of grade male
B	65.9%	34.1%
C	65.2%	34.8%
D	67.4%	32.6%
E	60.8%	39.2%
F	58.3%	41.7%
G	56.25%	43.75%
G2	50%	50%
H*	-	100%

* Level H is the ICO's most senior grade. The data does not include the Commissioner as she is not an employee of the ICO.

2.5 Staff by age group

Age Category	% of all staff
16-19	0.1%
20-29	18%
30-39	27.3%
40-49	24.3%
50-59	22.4%
60+	7.8%

2.6 Staff by ethnic origin

The information in the table is based on information held on the HR database.

	Number of staff	% of staff		% of Cheshire East population	2011 Census (England and Wales)
Asian and Asian British	18	2.4%		1.3%	6.8%
Black and Black British	<10	<1.3%		0.4%	3.3%
Chinese	<10	<1.3%		0.3%	0.7%
Mixed ethnicity	16	2.1%		1.0%	2.2%
Other ethnicity	<10	<1.3%		0.2%	1.0%
White (British, English, Irish, Scottish, Welsh)	643	84.6%		94.2%	81.5%
White (other white backgrounds)	23	3.0%		2.5%	4.4%
No data provided/ prefer not to say	47	6.2%			

2.7 Staffing and disability

	% of staff based on HR database entries*
Disabled	4.6%
Not disabled	95.4%

*The HR database only records a positive declaration if a member of staff considers themselves to be disabled.

2.8 Other demographic information regarding protected characteristics

The ICO does not routinely gather other demographic information from staff regarding characteristics, for example sexual orientation, religion or belief, caring responsibilities.

Such information has previously been gathered as part of staff survey data, but this has not been captured in our most recent surveys, and consequently any data presented would be out of date.

We will update our Equality Information when more up to date information has been gathered.

2.9 Work patterns

The ICO operates a system of flexible working hours which allows people to start work as early as 7.00am or as late as 10.30am; and finish work as early as 3.00pm or late as 7.00pm.

There are currently 161 staff at the ICO who work part time. This represents around 21.1% of the workforce.

There are 29 staff who work 'compressed hours' which allows them to work their contracted hours in fewer working days e.g. 37 hours in 4 days, or 74 hours in 9 days. Of these staff 20 are full time and 9 are part time.

In total there are 79 different contractual work patterns worked by ICO staff.

Staff can apply to change their working hours for any reasons, including the care of children or dependents. The ICO has a procedure for dealing with such requests to ensure that they are handled fairly.

2.10 Career breaks

The ICO allows staff to apply for a career break once they have completed two years of service.

Career breaks can be taken for a number of reasons, including a break for the care and upbringing of children or the care of an adult dependent.

2.11 Home working

Many ICO staff are able to work at home for some of their working hours – this might be on a regular planned day of the week or on an ad hoc basis.

Whilst staff are required to dedicate themselves to their work whilst they are at home, our homeworking provisions can help staff in a number of ways. For example, the removal of the need to commute every day may allow someone to be closer to child/dependent care provision and allow an earlier pick up.

Our IT strategy will further roll out the ability of staff to work from home regularly, or on occasion, so that more staff will be able to benefit from the flexibility that it can bring.

2.12 Reasonable adjustments

We aim to ensure that our policies, procedures and work environment are inclusive by design. When developing new systems of work we take due regard for equality considerations.

However, to ensure that we can make suitable arrangements if things are not suitable for the needs of all individuals, the ICO has 'reasonable adjustment' policies for customers and staff.

The Service Adjustment policy is designed to enable our customers, including disabled customers, are to use the ICO's services if the standard processes prevent such access.

The staff Reasonable Adjustment policy states how the ICO will make reasonable adjustments to work content, hours or the work environment to allow a disabled member of staff to work effectively, or to allow a member of staff who is or becomes disabled to remain in work. The ICO also makes adjustments for people who have short term health conditions, but are not disabled, to enable them to return to, or remain in, work.

The ICO regularly makes adjustments to work patterns, the work environment or equipment to allow staff to continue to work. The organisation uses the advice of occupational health whenever appropriate.

The Human Resources team have mapped the reasonable adjustments made for staff and held discussions with those who have adjustments to ensure that the support they have is suitable for them. Where further support needs have been identified, additional provisions have been put in place.

2.13 Equal Pay Analysis

The ICO has eight pay grades, from job Levels B through to H, with Level B being the most junior position.

Our pay system is designed to be fair and reflect the performance of individuals within their jobs.

Almost all new staff start on the Entry Rate for their pay grade, and pay awards are made each year in line with government policy and following discussions with our trade unions. Pay arrangements will also allow staff to progress their salary as their competence, contribution and impact develops.

Staff who are promoted receive an increase of a minimum increase in salary of 10%, so staff who have been in their previous grade for some time may start their new job part way up the pay range for the job into which they have been promoted.

The table below sets out the average salaries of men and women in each pay grade, along with the average time of each gender in each grade. These figures reflect the salaries paid to staff on 31 March 2019 and are those which will be reported under the gender pay gap reporting requirements.

The outputs from our new pay system will be reported in 2020/21 with salaries based on those received on 31 March 2020.

The final column shows the percentage pay differential between the genders. A positive percentage indicates the average salary is higher for women than men, and a negative percentage shows that the average is higher for men than women.

The average (mean) salary for women in the ICO is £31,575. The average salary for men is £34,653. This represents a gap of 8.9%.

The median salary for women is £26,948. The median salary for men is £27,096. This represents a gap of 0.5%

A further breakdown of salaries by grade and gender is provided on the following pages.

		%
1. Mean Gender Pay Gap (Ordinary Pay)		8.9%
2. Median Gender Pay Gap (Ordinary Pay)		0.5%
3. Mean Gender Pay Gap (Bonus Pay in the 12 months ending 31 March)		7.7%*
4. Median Gender Pay Gap (Bonus Pay in the 12 months ending 31 March)		21.8%
5. Proportion of Male and Female employees paid a bonus in the 12 months ending 31 March	Male	43%
	Female	54.9%
6. Proportion of Male and Female employees in each pay quartile		
Quartile	Female %	Male %
First (lower) quartile	64.2%	35.8%
Second quartile	64.4%	35.6%
Third quartile	64.7%	35.3%
Fourth (upper) quartile	56.7%	43.3%
Organisation	62.6%	37.4%

The average (mean) salary for women in the ICO is £31,575 (this equates to £16.41 per hour).

The average salary for men is £34,653 (this equates to £18.01 per hour). This represents a gap of 8.9%.

The median salary for women is £26,948 (£14.06 per hour). The median salary for men is £27,096 (£14.08 per hour). This represents a pay gap of 0.5%.

*Additional payments of 3% of actual salary were paid to staff in Grades B-D in August 2018.

The average payment to women was £672. The average payment to men was £724. The 7.7% is the gap in the average payment received.

Payments were pro-rated to hours worked. More women than men are part-time, so a comparison has been made to assess the Full Time Equivalent average payment which was £724 for women and £737 for men. This is a gap of 1.8%.

A further breakdown of salaries by grade and gender is provided below.

Job Level B

	Proportion of staff	Average time in grade	Average pay	Average female vs average male salary
Female	65.9%	4.11 yrs	£19,739	-0.1%
Male	34.1%	7.02 yrs	£19,758	

Job Level C

	Proportion of staff	Average time in grade	Average pay	Average female vs average male salary
Female	63.5%	1.70 yrs	£21,434	+0.05%
Male	36.5%	1.60 yrs	£21,423	

Job Level D

	Proportion of staff	Average time in grade	Average pay	Average female vs average male salary
Female	67.9%	2.43 yrs	£27,196	+0.7%
Male	32.1%	1.74 yrs	£27,000	

Job Level E

	Proportion of staff	Average time in grade	Average pay	Average female vs average male salary
Female	59.3%	3.31 yrs	£35,660	-1.6%
Male	40.7%	3.97 yrs	£36,219	

Job Level F

	Proportion of staff	Average time in grade	Average pay	Average female vs average male salary
Female	62.5%	3.45 yrs	£47,240	-0.8%
Male	37.5%	3.11 yrs	£47,628	

Job Level G

	Proportion of staff	Average time in grade	Average pay	Average female vs average male salary
Female	51.7%	1.2 yrs	£58,651	-7.2%
Male	48.3%	3.14 yrs	£62,853	

Job Level G2

	Proportion of staff	Average time in grade	Average pay	Average female vs average male salary
Female	27.3%	0.54 yrs	£79,743	-0.8%
Male	72.7%	0.55 yrs	£80,420	

Job Level H

	Proportion of staff	Average time in grade	Average pay	Average female vs average male salary
Female		-		N/A
Male	100%	1.58 yrs	£100,731	

Part 3: Information on services, policies and other functions:

This section of the report is concerned with the services, policies and practices of the ICO and how, through the provision of those functions, we have endeavoured to meet our obligations under the Equality Act and enhance equality of opportunity in society.

It is not intended to provide an exhaustive list of every action or activity that we take which helps to further equality of opportunity. Rather, this section of the report will provide an overview of how the ICO contributes to a more equal society, particularly through our remit as the regulator of information rights.

Where helpful, we provide illustrative examples of the types of activity that are being delivered within key business areas.

3.1 Our strategic goals

The ICO remains committed to ensuring that equality and diversity issues are considered as part of the planning and conduct of our activities.

Our Information Rights Strategic Plan sets out our goals to be an effective and accessible regulator. Our goals are:

- Goal #1: To increase the public's trust and confidence in how data is used.
- Goal #2: Improve standards of information rights practice through clear, inspiring and targeted engagement and influence.
- Goal #3: Maintain and develop influence within the global information rights regulatory community.

- Goal #4: Stay relevant, provide excellent public service and keep abreast of evolving technology.
- Goal #5: Enforce the laws we help shape and oversee.
- Goal #6: To be an effective and knowledgeable regulator for cyber related privacy issues.

Intrinsic to all of these goals is a core mission to ensure that information rights are accessible and understood by all members of the community.

Our enforcement activity is geared towards protecting the public from misuse and abuse of the law, and is frequently centred on the protection of vulnerable and protected groups.

Our work to protect younger people, such as the Age Appropriate Design Code, seeks to safeguard some of our community's most vulnerable people at a time when the advancement of technology means that privacy can be impacted upon in ways which were never possible before.

3.2 Our Values

Coupled with our new organisational values, which are part of our People Strategy, we aim to enhance the services we provide to the public and stakeholders, whilst continuing to be a supportive employer.

We are a large organisation providing a diverse range of public services – but a common thread runs through all that we do. Our three core values: ambitious, collaborative and service focused are central to the way we work. They influence the way we plan, make decisions, how we behave towards one another and continually challenge ourselves to achieve our vision.

Collectively our values expect us to behave in a certain way:

Ambitious - Working boldly, ready to test boundaries and take advantage of new opportunities... Working with a sense of genuine urgency, continuously improving when striving to be the very best we can be.

Collaborative – Working towards achieving our goals, supporting one another whilst seeking and sharing information and expertise and working effectively with a range of partners to achieve our collective objectives.

Service focused – Working impartially and ethically to provide excellent services - continuously innovating to remain relevant to the environment we regulate.

The importance of working impartially and ethically should not be understated. The concepts of equality, diversity and fairness are hard-wired in to each of these values and the update to our pay systems.

3.3 Supporting mainstreaming through the Equality and Diversity Committee/Forum.

We are seeking to transform our governance of Equality and Diversity so that we can be inclusive of more people and more proactive in our work, which will reflect the extent to which the ICO has grown in the last two to three years.

Our current Equality and Diversity Committee is made up of representatives from across the ICO. Members bring with them a range of experiences, as well as their insight into operational matters. They help to advise upon equality issues, and raise awareness around the organisation.

The Committee includes two members of our Senior Leadership Team, and so has direct links to the most senior levels of management in the organisation.

However, we feel we can improve on this by re-structuring how the group works.

During 2019 we have formed network groups for staff who have a variety of protected characteristics. Those groups also welcome members who do not share the protected characteristic, but are supportive of their interests.

We have formed groups which represent people of different Race, Ethnicity and Cultural Heritage; staff who are LGBTQ+; Women; Disabled People; and a group which supports and encourages good mental health.

Nominated chairs of each of these groups will attend the new Equality and Diversity Forum. The Forum will receive feedback from the groups, seek their input and views about the development of the ICO and feed this into the Senior Leadership team.

We intend this to enable more people to contribute on issues which they feel really impact upon them, and allow us to have a more inclusive and influential workforce.

3.4 Ensuring staff are trained in equality issues

Training, both formal and informal, is a key contributor to the delivery of many aspects of the ICO Corporate and Business plan and fundamental to the delivery of the organisational equality objectives.

The ICO places considerable value in ensuring that staff receive the necessary training so that they can develop skills and understanding of their roles in line with the aims and objectives of the ICO.

There has been a significant amount of training and awareness sessions which have an equality dimension in recent years, including 'Dignity, Diversity and Inclusion' training, which is mandated for all new staff, 'Autism and Asperger's Awareness', and Building Equality into Business Planning.

These sessions help to improve awareness of matters that affect our customers, as well as ensuring that staff are fully

versed in the organisation's commitment to fairness, equality and dignity in our dealings with each other.

3.5 Monitoring and evaluating equality data.

Collecting information to help understand the needs and issues relating to the diversity of staff and customers is important when monitoring progress towards the ICO's overarching equality objectives.

The ICO collects a wide range of data from staff monitoring and surveys and some more limited data from customers.

Customer satisfaction surveys measure a range of issues to do with our performance and customer handling.

We continue to monitor recruitment processes to ensure that they are conducted fairly and encourage applications from across the whole community.

3.6 Ensuring that staff and customers can access information and services.

Our communications need to be accessible to as wide a range of people as possible.

We seek to comply with the principles of inclusiveness that incorporate the provisions of the Equality Act, Northern Ireland legislative requirements, and the Welsh language requirements.

The ICO website meets AAA accessibility standards wherever possible (the government requires AA status). This means, for example, that text size can be altered and a *browsealoud* facility is available. This functionality has been improved in the last twelve months.

All publications are produced to accessibility standards and the corporate "Style Guide" also incorporates this good practice. For example all ICO publications:

- use sans serif fonts for core text;
- use a font size of 12 point minimum and 14 points for important information;
- maximise white space
- use a dark out of white colour scheme
- use good quality matt paper to reduce glare and the text showing through from the other side.

The ICO also trains staff to write in plain English and has produced a "Style Guide". The ICO:

- limits sentences to between 15 – 20 words;
- avoids dense block text paragraphs;
- uses line spacing between paragraph breaks;
- keeps lines left justified with a ragged right edge;
- uses bullets or numbers rather than continuous prose;
- uses fact boxes to make main point clear;
- uses images where possible to support text; and
- seeks accreditation by the 'Plain Language Commission' for key leaflets and guidance.

We do not undertake translation of all publications as a matter of course, but we will respond to individual requests in line with our Translations Policy, which can be found on our website.

Our operational procedures establish approaches both for handling customers with particular needs and making

'reasonable adjustments' as defined within equality legislation.

In relation to learning and development, flexible options are built in covering timing of events, location, format of materials and method of delivery.

The ICO also ensures that work related events, and any refreshments served there, are inclusive as possible taking particular account of religion or belief.

In addition to these long standing arrangements, the ICO has introduced 'live chat' services which enable members of the public to interact with the organisation online. This has promoted accessibility for those who may feel anxious using the telephone helpline service, or perhaps have hearing impairments which could be a barrier to using the service.

Appendix 1: Goals and actions within the ICO People Strategy which have an equality dimension

People Goal	Description
Goal 1	Inspire continuous improvement through common values and a high performance culture.
	<ul style="list-style-type: none"> <li data-bbox="528 427 1877 512">• Develop leadership capability, equipping and empowering our managers to lead effective teams Action: Building on our Management Forum, develop a leadership profession at the ICO based on the development of skills and competencies which light a clear career path from first line manager through to executive leadership. <li data-bbox="528 703 2018 788">• Challenge, support and develop people so they can deliver first class services Action: Review our personal development practices and processes to ensure they facilitate frequent 'check ins' between people and their managers and provide ongoing support and challenge. <li data-bbox="577 979 1989 1107">Action: Complete the implementation of a coaching and mentoring programme to enable our people to be resourceful when exploring ways to develop and improve and be the best they can be.

Goal 2	To be the best employer we can be, attracting and retaining the very best talent.
	<ul style="list-style-type: none"> <li data-bbox="528 256 2027 507"> <p>• Recruit the best possible people Action: We will routinely profile the diversity of our workforce and actively ensure our policies, working practices and environment are conducive to attracting and retaining staff with a diverse range of skills, backgrounds and working styles and preferences. This includes identifying potential or actual inequalities in our practices and taking swift action to remove them.</p> <li data-bbox="528 563 2027 730"> <p>• Provide opportunities for professional and personal development Action: We will implement an on-going review of our people policies to ensure that they provide a framework for working which is relevant, suited to the needs of the business and consistent with our values.</p> <li data-bbox="528 786 2027 1034"> <p>• Our total reward package, benefits and ways of working will enable us to attract and retain the best people Action: Establish varied and impactful ways for all ICO staff to share their views and be consulted on matters of importance – including a range of staff and management forums, regular engagement surveys and constructive industrial relations with our recognised trade unions.</p> <li data-bbox="528 1090 2027 1305"> <p>• Grow a culture where caring and supporting others is valued and the ICO is a good corporate citizen Action: In addition to implementing a wellbeing policy and associated action plan, we will develop a social responsibility plan to promote how we can collectively and individually benefit the community and wider society as a whole.</p>

	<ul style="list-style-type: none">• Provide inspiring, effective, safe and accessible workplaces and flexible approaches to work Action: Through the work of the Accommodation Project, ensure that our accommodation remains adequate and fit for purpose in line with the standards expected of a modern regulator and employer of choice.• Provide agility of work location Action: We will provide staff with the necessary equipment and infrastructure to work in a way which maximises their effectiveness irrespective of their location.
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Appendix 2: Examples equality of actions and outputs in the last year

Summary of Action Taken	Business and E&D Impact	Groups most benefitting from the action
The ICO operates the 'Disability Confident' standard of guaranteed interviews for disabled job applicants who meet the minimum criteria for the job.	Encourages a diversity of experience in the workforce and improves accessibility of job opportunities to disabled people.	Disabled people
We provide a wide range of adjustments for staff, and have implemented systems for anticipating the requirements of new joiners to our organisation.	Ensuring that disabled staff (including new starters), and those with shorter term health conditions, are able to work comfortably and have the equipment and work arrangements needed to work effectively.	Disabled staff and staff with health conditions.
We have ensured that our office spaces are accessible and have adequate facilities for disabled staff.	Providing equal access to building facilities and improving convenience for all staff.	Disabled staff and those with difficulties accessing facilities elsewhere in the building.
We provide learning materials in a variety of formats to meet the needs of staff undertaking training.	Ensures that all staff are able to fully access training and equally able to benefit from the desired learning outcomes.	Staff with varying learning styles or who have disabilities such as visual impairments or dyslexia

<p>We continue to use our Live Chat online service for our helpline. This enables customers to access our services in a new way, and is of potential benefit to hearing impaired customers.</p>	<p>Enables customers to contact via a wider range of methods and improves accessibility of our services.</p>	<p>All customers who have difficulties with, or prefer not to have, telephone interactions.</p>
<p>We make adjustments, using our Reasonable Adjustments policy, to the way we provide services to customers who are otherwise unable to access our services.</p>	<p>Improvements to the services to all customers and promotion of accessibility of information rights.</p>	<p>Disabled people and others for whom access to our services may be difficult.</p>
<p>We are developing a Well-being strategy which aims to support staff to be well at work.</p>	<p>Improving staff welfare and awareness of support.</p>	<p>ICO staff, particularly those with caring responsibilities.</p>
<p>We provide enhanced maternity, paternity, adoption and shared parental leave and pay provisions.</p>	<p>Supports parents with their caring responsibilities and encourages retention of experienced staff.</p>	<p>Parents and those with child care responsibilities.</p>
<p>We have delivered a variety of awareness sessions for staff, such as deaf/hearing impairment awareness; Asperger's; and autism awareness.</p>	<p>Improved appreciation of different disabilities and greater understanding of how the ICO can meet the needs of customers.</p>	<p>Disabled people</p>

<p>We have produced Equality and Diversity factsheets to support staff to develop their knowledge of equality and diversity issues.</p>	<p>There are four factsheets, called 'Doing the duty', 'What is a disability?', 'Useful Equality and Diversity websites' and 'Top tips on how to behave around people with a disability'. We also have produced a Dyslexia style guide – 'Communicating to someone with Dyslexia'</p>	<p>Customers affected by the conditions covered by the factsheets.</p>
<p>We held an internal campaign raising awareness of language and terms people use which may be offensive to those who have a mental health condition.</p>	<p>Improved awareness and understanding of the issue. Promotion of inclusiveness.</p>	<p>People who have mental health conditions.</p>
<p>We conducted a well-being survey of our staff members to understand what we do well, and what we could improve.</p>	<p>Directing the development of our Well-being strategy and action plan – helping the ICO to be a better employer.</p>	<p>ICO staff</p>
<p>We have developed the 'Be aware' campaign to help people to understand how organisations may use data about them to target them on line.</p>	<p>Increasing public awareness of this issue, reducing vulnerabilities.</p>	<p>All members of the community</p>
<p>We have developed, and are consulting upon, an Age Appropriate Design Code to protect children and young people by implementing standards for information society services eg apps, websites, games,</p>	<p>Enhancing the protection of young people on line by implementing safeguards for their personal information to be enacted by service providers.</p>	<p>Children, young people and their parents.</p>

programmes and online community environments.		
We have investigated cases concerning the disclosure of information relating to gender reassignment, ethnicity, sexual orientation and disability amongst others. Our enforcement action emphasises the importance of ensuring the security of such sensitive data.	Providing protection for people who have very sensitive personal data held by organisations. Helping to improve compliance with the law.	A range of groups across society.
We have taken enforcement action against companies who have sent millions of nuisance texts and spam emails to the public and have targeted people for scam cold calling.	Protecting the general public, particularly those in the most vulnerable groups, for example the elderly.	All of the community, but with particular benefit for the most vulnerable people.
We have taken enforcement action against an organisation which illegally shared the data of parents and their babies which they obtained for a different purpose.	Ensuring that the data of new parents and children is protected, and is only used for the purpose for which it was provided and not for data brokering.	New parents and children

<p>We have fined a local authority for inappropriately sharing information about people featuring on a 'gangs matrix' in respect of suspected gang members. The information shared featured a high proportion of people from BAME communities.</p>	<p>Ensuring that organisations who have access to such sensitive information treat it with care. Protecting people's data from across the community, in this instance particularly people from Black, Asian and Minority Ethnic communities</p>	<p>All of the community.</p>
<p>We have provided guidance for GPs and their patients about accessing medical records.</p>	<p>The guidance will help GP surgeries comply with the law and provide improved access to records for their patients.</p>	<p>All of the community, with particular benefit for regular users of GP services.</p>
<p>We have undertaken a wide range of speaking engagements covering the public, private, charity and third sectors.</p>	<p>Cascading good information rights practise across society.</p>	<p>All of the community.</p>