

People and Equality Impact Assessment

This document fulfils the ICO's requirements to conduct Equality Impact Assessments, as a requirement to have due regard under the Equality Act. 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 People and Equality Impact Assessments (PEIAs), which you can access [through this link](#), along with a glossary of issues to consider, which you can access [through this link](#). The purpose of PEIAs 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 before completing the document.

Please tick here to confirm that you have read the [guidance](#).

Please tick here to confirm that you have read the [glossary of issues to consider](#).

Completed PEIAs will be published [on the ICO's website](#).

Summary

Please provide your name.

Answer: SS

What is the title of this piece of work? Please try to ensure that this is likely to be understandable to everyone in the ICO.

Answer: Pulse 360 staff survey

Briefly describe the overall purpose of this work.

Answer: To enable the ICO to perform short, pulse surveys to gather staff feedback

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 or No

Answer: Yes – Enhancing Employee Voice to support wider staff engagement and to be able to get a quick temperature and feedback check of the organisation on specific topics and activities

*If you answer **No** to this question, you may not need to complete a PEIA. PEIAs are only required for policies, procedures and similar. However, with the ICO's commitment to equality, we would like PEIAs to be completed for as much of our work as possible. This should be beneficial in ensuring that you consider any potential equality issues while developing work.*

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 (e.g. monetary penalties, enforcement notices, information notices etc)?

Please answer Yes or No

Answer: No

*If you answer **Yes** to this question, you may not need to complete a PEIA. You do not need to do a PEIA in coming to a decision regarding regulatory action, or explaining how the law operates, as equality considerations are assumed to be part of the laws. However, in areas such as guidance or anything similar, you should definitely complete a PEIA.*

If a PEIA is not required, the person with responsibility for this piece of work should decide whether a PEIA should be completed.

Impact on people with protected characteristics

The issues to consider annex, [available through this link](#), sets out some issues that you should consider for each protected characteristic.

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. 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?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
Religion or belief	Provision of an additional survey tool to facilitate smaller pulse surveys should have no impact on religion or belief. Participation in surveys is optional.	Appropriate training will be provided to those involved in the production of surveys and the associated questions. All survey questions will be signed off by Executive Director, Director or Head of Department Survey data will be anonymised.
Race, nationality or cultural background	Provision of an additional survey tool to facilitate smaller pulse surveys should have no impact on race, nationality or cultural background. Participation in surveys is optional.	Read aloud functionality may assist in translation where English is not a person's first language. Appropriate training will be provided to those involved in the production of surveys and the associated questions.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
		<p>All survey questions will be signed off by Executive Director, Director or Head of Department.</p> <p>Survey data will be anonymised</p>
Disabled people	<p>Pulse 360 is a Microsoft partner and their product is developed to AA accessibility standard. Pulse follow WCAG standards and are starting to follow ARIA standards for their web app.</p> <p>The product has screen reader and magnifier options as standard and the Pulse team have been validating these across the different components of Pulse 360.</p> <p>Initial feedback has highlighted some issues on the charts, colours and their accessibility with a screen reader. Charts often use colour to show values which doesn't work with a screen-reader, or may make it more challenging for those with visibility impairments to interpret the data.</p>	<p>Pulse 360 is a web based service which can make use of browser assistive technologies. Pulse 360 are working towards AAA accessibility standard.</p> <p>Early testing on accessibility highlighted that some survey responses were not confirmed back to the user in an audible way, this has now been rectified.</p> <p>Further tests of the system with assistive technology users and further specific work on reasonable adjustments depending on access issues identified, will be undertaken during the implementation and rollout taking place during phase one which will run until end of June (end of Q1).</p>
Sexual orientation	<p>Provision of an additional survey tool to facilitate smaller pulse surveys should have no impact on sexual orientation.</p> <p>Participation in surveys is optional.</p>	<p>Appropriate training will be provided to those involved in the production of surveys and the associated questions.</p>

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
		All survey questions will be signed off by Executive Director, Director or Head of Department. Survey data will be anonymised
Sex (see note 1)	Provision of an additional survey tool to facilitate smaller pulse surveys should have no impact on sex. Participation in surveys is optional.	Appropriate training will be provided to those involved in the production of surveys and the associated questions. All survey questions will be signed off by Executive Director, Director or Head of Department. Survey data will be anonymised
Age	Some people, regardless of age can find it more difficult to learn and interact with new technologies. Participation in surveys is optional.	Training guides and assistance will be available for anyone completing surveys. Regular short surveys should assist with staff becoming more familiar with the process. Appropriate training will be provided to those involved in the production of surveys and the associated questions. All survey questions will be signed off by Executive Director, Director or Head of Department. Survey data will be anonymised.
Gender reassignment (see note 2)	Provision of an additional survey tool to facilitate smaller pulse surveys should have no impact on gender reassignment.	Appropriate training will be provided to those involved in the production of surveys and the associated questions.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
	Participation in surveys is optional.	All survey questions will be signed off by Executive Director, Director or Head of Department. Survey data will be anonymised
Marital status	Provision of an additional survey tool to facilitate smaller pulse surveys should have no impact on marital status. Participation in surveys is optional.	Appropriate training will be provided to those involved in the production of surveys and the associated questions. All survey questions will be signed off by Executive Director, Director or Head of Department. Survey data will be anonymised
Pregnancy and maternity	Provision of an additional survey tool to facilitate smaller pulse surveys should have no impact on pregnancy and maternity. Participation in surveys is optional. The surveys can be accessed 24/7 from normal laptop devices issued to all staff, allowing the surveys to be accessed around appointments and where appropriate managers may make their team members aware of surveys when they are on leave, so that staff on maternity or paternity leave will have the opportunity to participate.	Appropriate training will be provided to those involved in the production of surveys and the associated questions. All survey questions will be signed off by Executive Director, Director or Head of Department. Survey data will be anonymised
Political opinions	Provision of an additional survey tool to facilitate smaller pulse surveys should have no impact on political opinions.	Appropriate training will be provided to those involved in the production of surveys and the associated questions.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
	Participation in surveys is optional.	All survey questions will be signed off by Executive Director, Director or Head of Department. Survey data will be anonymised
People with dependants	Provision of an additional survey tool to facilitate smaller pulse surveys should have no impact on people with dependants. Participation in surveys is optional	Appropriate training will be provided to those involved in the production of surveys and the associated questions. All survey questions will be signed off by Executive Director, Director or Head of Department. Survey data will be anonymised
People without dependants	Provision of an additional survey tool to facilitate smaller pulse surveys should have no impact on people without dependants. Participation in surveys is optional	Appropriate training will be provided to those involved in the production of surveys and the associated questions. All survey questions will be signed off by Executive Director, Director or Head of Department. Survey data will be anonymised
Socio-economic groups or social classes (see note 3)	Provision of an additional survey tool to facilitate smaller pulse surveys should have no impact on people in socio-economic groups or social classes. Participation in surveys is optional	Appropriate training will be provided to those involved in the production of surveys and the associated questions. All survey questions will be signed off by Executive Director, Director or Head of Department. Survey data will be anonymised

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
Multiple protected characteristics (see note 4)	Provision of an additional survey tool to facilitate smaller pulse surveys should have no impact on people with multiple protected characteristics.	There is a general potential benefit for all characteristics insofar as survey responses may uncover opportunities to enhance the employee experience - that could be true for specific groups or more broadly.

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

Note 2: you may wish to consider the impact on transgender people while considering people undergoing gender reassignment, although gender is not a protected characteristic under the Equality Act

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 (e.g. the same issue has a positive impact on people with one protected characteristic but a negative impact on people with another protected characteristic)

If you state that for any negative impact the mitigation you have identified will not be able to fully mitigate the negative impact, you will need to contact HR to discuss next steps. Details are provided at the end of this document.

Q4. The ICO's Welsh Regional Office has a statutory requirement to provide services through the medium of the Welsh language. Will there be a requirement for this work to include a Welsh-language element?

Please answer Yes, No or Don't Know

Answer: No

If you answer **Yes or Don't Know** to this question, you will need to contact the Welsh Regional Office to discuss next steps.

Contributing towards the ICO's equality objectives

Q5. How does this work contribute towards the ICO's equality objectives? For each of the objectives in the table below, please explain how the work you are doing will contribute to achieving this objective or state "no contribution". If there are ways that the contribution could be increased, please also mention them here.

Objective	Contribution to objective
Objective 1: <u>Spreading knowledge and taking action</u> : 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 discriminate.	Survey questions and responses may be used to highlight knowledge gaps and identify follow-up actions to be taken.
Objective 2: <u>Accessible services</u> : 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.	Survey questions may be used to identify skills and knowledge gaps, where more focus and training may be required. Survey questions could highlight gaps in the accessibility of employee products and services leading to improvements in the employee experience.

Objective	Contribution to objective
Objective 3: 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.	Feedback we provide to the system supplier may contribute to future improvements in areas such as accessibility.
Objective 4: 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.	Pulse surveys will assist with enhancing the employee voice . Survey questions may be used to further understand diversity, skills and experience of our staff. We will be able to conduct pulse surveys, to get a real time sense of how our colleagues are feeling at a moment in time. Questions may be focussed on health and wellbeing, EDI or supporting the development of the people strategy.

Monitoring and evaluation

Q6. What arrangements are in place, or will you put in place, to monitor and evaluate the impact of the work on equality?

Answer: A service owner will be appointed to ensure that any changes to the service will be reviewed accordingly for impact to the protected groups. All survey questions will be signed off by Executive Director, Director or Head of Department

Q7. How long will these arrangements be in place?

Answer: These controls will be in place for the lifetime of the service.

Q8. When do you intend to review this monitoring to assess the impact of this work on equality? This should usually be done no later than a year after implementation and may need to be ongoing as part of regular review of the work.

Answer: Service owner will be continually aware of and reviewing changes that could impact on the protection groups, especially during each phase of further rollout within the organisation. Phase one will run until end of June (end of Q1), There will then be a review, with the view to utilising further functionality and rolling out to ET and Private Office. DPIA and PEIA should be reviewed at this stage.

Publication

Q9. As stated above and in the guidance, we intend to publish all completed PEIAs on the ICO's website. Are there any parts of your answers to the questions above which need to be redacted prior to publication? Should publication be delayed until a certain date? If so, please provide details for each of these questions in the box below.

You should also review the wording to ensure that it is likely to be as understandable as possible to any member of the public.

Answer: Can be published.

Conclusion and sign-off

Thank you for completing this PEIA.

You should ensure that the person with overall responsibility for the piece of work the PEIA refers to is 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. This might be you, your line manager or someone else in the ICO. Therefore, you may need to provide this PEIA form to that person for review prior to completing it.

Please tick here to confirm that you have consulted with the relevant EDI staff networks or other colleagues where appropriate.

Please state here who has signed off the PEIA.

<i>Signed off by:</i> Jen Green

At each of their meetings, the EDI Board will receive a summary of the PEIAs which have been completed over the previous six weeks. However, the role of the EDI Board is **not** review and approval of PEIAs, rather overall assurance that the PEIA process is operating effectively.

For the actions which you have identified, you must complete a PEIA action plan, which you can access at [this link](#).

If you have identified that there are any negative impacts to any protected characteristics that you cannot fully mitigate (so that despite your best efforts, there will still be a negative impact to people with that protected characteristic), you must contact HR for advice.

Please send your completed form to corporategovernance@ico.org.uk for storage and publication.