

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 (Director sponsor for Customer Experience Programme)

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 | <p>Our ICO website is accessible, as are the new tools added to the website to help customers self-serve.</p> <p>We will retain a helpline for customers with accessibility needs, (this will be an option on the main ICO helpline number 0303 123 1113) so they can continue to access telephony services.</p> |

| 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>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> <p>We will also monitor feedback from customers using live chat and the website to identify if we can improve the customer experience and in</p> |

| 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. |
|---|--|---|
| | | particular take action on any accessibility feedback. |
| Sexual orientation | No | |
| Sex (see note 1) | No | |
| Age | No | |
| Gender reassignment (see note 2) | No | |
| Marital status | No | |
| Pregnancy and maternity | No | |
| Political opinions | No | |
| People with dependants | No | |
| People without dependants | No | |
| Socio-economic groups or social classes (see note 3) | No | |

| 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. |
|--|---|--|
| Multiple protected characteristics (see note 4) | No | |

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

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

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

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

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

Please answer Yes

*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 .*

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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

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: We will represent the communities and societies we serve</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: Our culture will be inclusive</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: We will better understand the needs of everyone to deliver services that are accessible to all</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: 21 November 2024

Approved by line manager:

Signed by: Rob Holtom on behalf of Louise Locke
Date: 22 November 2024

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

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

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

Section 75 The Northern Ireland Act

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

1. We will externally publish a list of all EqIA screenings we complete. We should publish these quarterly. The spreadsheet will be 'housed' on the ICO website [Equality and diversity | ICO](#) (these will include **all** EqIA screenings we complete)
2. Where an EqIA screen results in the need for a full EqIA on a policy, procedure or change that relates directly to the ICO carrying out its external statutory functions; we will consult with key stakeholders at the earliest opportunity for 12 weeks. By law we must consult with the Northern Ireland stakeholder list, but good practice would be to include other relevant stakeholders from across the UK. The author/approval

manager will be best places to determine who these should be.

3. We have clarified that if we don't receive a response from these stakeholders to a consultation, that is fine. We record no response and move on with the policy, procedure or change.
4. We have clarified that we do not need to consult under s75 for policies that only impact our staff. Whilst its good practice to consult with staff, TU etc about changes that impact employees, ways of working etc, this type of internal change would not engage s75. We should of course complete an EqIA at the earliest opportunity, it's just that the s75 consultation requirement is unlikely to be engaged.
5. We have agreed that it would be for the manager who approves the EqIA to determine if a s75 consultation is needed. The Inclusion and Wellbeing team can provide support, but the author and manager will know their business area and will be best placed to assess if a new/change to a policy impacts external customer and stakeholders as part of our statutory function and should therefore be consulted on.
6. We have agreed that it should be for the author/approving manager to send the EqIA screening form or full EQIA form to corporate governance.

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

| | |
|------------------------------|-------------------------------------|
| Version number | V0.2 |
| Status | Draft ready for approval |
| Relevant or related policies | Equality Impact Assessment Guidance |
| Author/owner | Suzanne Gordon |
| Approved by | Rob Holtom |
| Date of sign off | 22 November 2024 |
| Review date | |

| Version | Changes made | Date | Made by |
|---------|-----------------------------|-------------|----------------|
| V0.1 | First draft | 2 Oct 2024 | Suzanne Gordon |
| V0.2 | Additional mitigation added | 21 Nov 2024 | Suzanne Gordon |
| V1.0 | EQIA form approved | 22 Nov 2024 | Rob Holtom |

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

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|------------------------------|-------------------------------------|
| 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 |

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|-----|--|------------------|--------------------|
| 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 |