Equality Impact Assessment (EqIA)

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

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

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

Summary

Prepared by:
Chris Yacomine, Senior Product Owner
Reviewed by:
Shemiah Thomas, Head of Delivery
Kevin Parry, Director of Data

What is the title of this piece of work?
Microsoft 365 Copilot

Briefly describe the overall purpose of this work.

What is happening?
The ICO is committed through its Enterprise Data Strategy to deliver tangible value through data and analytics to us and our customers. Y1 of our transformation prioritises value delivery in the areas of productivity, efficiency and income collection. This project aims to improve productivity and transform our business processes through the use of Microsoft 365 Copilot, referred hereafter as 'Copilot'.

How will we do this?
By implementing a phased roll-out of Copilot across in-scope business units and user groups, dependent on the outcomes of our pilots.

Why are we doing this?
Our ambition is to dignify our people with Copilot as an assistant to help automate repetitive tasks and transform our ways of working, allowing our people to focus on more high priority work. Some of the proposed benefits are:
- Time Savings: Reduce time spent on repeatable tasks like notetaking, summarisation and content generation.
- Reduced admin costs: Standardised and automated meeting recaps lead to a reduction in admin staff support
- Increased Productivity: Reinvestment of time spent on high value tasks
- Improved Employee Experience: Less time spent on admin or repeatable tasks. Staff report quicker decision making given quicker turnaround time of summaries and actions.

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.
> Yes. This is a new product/tool, which is standalone and unique to the ICO, but will relate to our working practices.

*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 or No.
> No.

*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	• Positive impacts: The tool can be used with Welsh and English, removing any impact. If a colleagues first language isn't English, they need to spend additional time and effort checking their work outputs, an invisible workload that native speakers don't see.
Disabled or Neurodivergent	No	• Positive impacts have been detected for people with neurodiverse and accessibility needs, such as: **Note Taking / Meeting Minutes** - Colleagues, particularly those with neurodivergence, often avoid writing

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		up minutes as it is a dull, repetitive, 'low dopamine' task, leading to missed deadlines and a sense of letting others down, reducing confidence. - Visual sensory overload when typing up notes reduces ability to focus, and increases need to take screen breaks for some colleagues. - Auditory processing of spoken information can cause sensory overload which reduces ability to concentrate, and colleagues may miss information or need to take breaks. Writing up from notes that are unclear or incomplete is more difficult and increases need to rely on others to validate information. **Writing & Generating Content** - Visual sensory overload for some colleagues when reading a lot of information on a screen causes text to look fuzzy and they need to re-read information several times or need to take a break.

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.
		- Expectations, templates and guides for creating guidance products aren't always clear or accessible, particularly for new starters. - Some colleagues, particularly those with neurodivergence or learning difficulties, find it hard to transfer thoughts in their head to written content on paper which causes hesitation and confidence issues. - Checking spelling, grammar, phrasing, format and flow can be time consuming to check manually and being 'too close' to the work can mean corrections are missed. This is more significant for colleagues with dyslexia who find it particularly difficult to spot errors. **Using Current Technology and Tools** - Speech to text software such as MS Dictate and Dragon aren't intuitive or easy to add grammar to. Users have to remember to say 'comma' or 'full stop' aloud or alternatively spend a long time manually editing

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		the content afterwards which feels like they are repeating work. - Colleagues from the accessibility cohort are finding workarounds using existing tools available to them, which aren't the really the right tools to support their needs. - Closed captions on Teams is being used to help with auditory processing and taking meeting minutes, but this doesn't work effectively as captions disappear too quickly to be used to follow conversation. - Colleagues with ADHD are using Power Automate to create complex flows to help them remember deadlines or tasks they need to complete but find the solutions they've created are 'clunky' and could be set up much better with access to different technology. - Microsoft has designed Copilot so that it's compatible with screen readers too.

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

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

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

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

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

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

Please answer Yes, No or Don't Know
Yes, this service is being delivered to staff within the Welsh (Cardiff) office. CoPilot 365 can be used with the Welsh language too for prompting and receiving responses.

*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* ▮▮▮▮▮▮▮▮▮ *.*

Q5. In interests of best practice, you should consider whether this work may have a negative impact on or contravene any Human Rights. Click this link to the find an overview of each of the human rights and further details about each. The Human Rights Act itself is available at this link. Please confirm that you have considered this and set out any actions you will take to mitigate any impacts.

Answer: No further actions required

Contributing towards the ICO's equality objectives

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

Objective	Contribution to objective
Objective 1: **We will represent the communities and societies we serve** We believe that diverse teams make better decisions, boost creativity and innovation, enable greater professional growth and increase our understanding of the communities we regulate. As a workforce, we are	Positive contribution: As detailed above, especially for those with disabilities or neurodivergent needs, CoPilot 365 can offer a lot of positives which can make their day-to-day tasks and work life easier. Especially since Welsh native speakers can also utilise this tool.

Objective	Contribution to objective
the most effective and have the greatest impact when we are representative and consider different perspectives.	
Objective 2: **Our culture will be inclusive** We're at our best when we support and look out for one another, and when we trust and empower each other to be ourselves. That applies whether it's within the workplace or in the work that we do. We have measures in place to support our diverse workforce, such as reasonable adjustments. However, we will do more to remove the barriers that are preventing people from developing and progressing.	Positive contribution: As detailed above, especially for those with disabilities or neurodivergent needs, CoPilot 365 can offer a lot of positives which can make their day-to-day tasks and work life easier.
Objective 3: **We will better understand the needs of everyone to deliver services that are accessible to all** We target our regulatory interventions on the areas of greatest harm and to make a real difference to people's lives. Technological innovation by businesses means the landscape we regulate is constantly transforming. We know we're at our best when we understand the needs of all our customers, including those who experience vulnerability and communities of unmet need.	Positive contribution: As detailed above, especially for those with disabilities or neurodivergent needs, CoPilot 365 can offer a lot of positives which can make their day-to-day tasks and work life easier. As part of piloting the tool, we have conducted user research with a cohort of people with neurodivergent needs, which has helped us to understand their needs and pain-points in their work, which CoPilot can assist with.

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: A project team has been put together, which will continuously survey user opinions and gather feedback on the tool. This will be complemented with a community network where others can share best practice and how they have utilised the tool. And users have access to training on Viva Learning and via our project team, who can assist with any queries or new features that have been released.

This EqIA will be built upon as/when/if the project progresses with considerations being reviewed once new information or specifics are received, especially once we move beyond the pilot phase to a wider roll-out.

Q8. How long will these arrangements be in place?

Answer: For the foreseeable future, while the solution is in place.

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: Annually.

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: None.

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: *Chris Yacomine*
Date: 15/01/2025

Approved by line manager:

Signed by: Kevin Parry
Date: 14/02/2025

You **must** send your completed form to ███████████████████████ 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 ██████████████████████████ .

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	V1.0
Status	Final

Relevant or related policies	Equality Impact Assessment Guidance
Author/owner	Chris Yacomine
Approved by	Kevin Parry
Date of sign off	14/02/2025
Review date	01/04/2025 (post-pilot review)

Version	Changes made	Date	Made by
0.1	Initial draft for review	15/01/2025	Chris Yacomine
0.2	Expanded overall purpose section following feedback	20/01/2025	Shemiah Thomas, Kevin Parry
0.3	Final version for sign off	14/02/2025	Chris Yacomine

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