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: AF **Input from:** EB

What is the title of this piece of work? Project central app and reporting

Briefly describe the overall purpose of this work. **What is happening?**
This initiative is to enhance the existing projects reporting processes within Transformation and Delivery, by moving away from manual reports held in disparate systems such as Word or Excel and better using available technology where possible to coordinate our data and enable decision making.

The data is already collected and collated via different Excel spreadsheets, Word documents, and PowerPoint presentations. To meet the ICO's commitment to be a data led organisation, more insight and knowledge is required from existing project data to inform strategic business decisions. The ICO wants to move toward value driven processes for determining and prioritising transformation projects. Better data collation and management is regarded as a key step towards this.

Additionally, existing project reporting processes involve manual processing, which is demanding on resources, is a risk for data quality and can lead to key person dependencies (e.g. project or programme manager). Where possible we would like collect data once and collect it accurately and then use technology including automation to process data as required.

How will we do this?

Use the Microsoft stack (PowerApps, Power Automate, Power BI and Dataverse) to develop and implement a tool for use by project professionals, PMO and key stakeholders to enable the collection, recording and reporting on the transformation portfolio centrally. We will develop the app within PMO using a low code, no code approach and embed the use of the tool within T&D to support the management of projects, programmes, and portfolio. Project Central compliments MS Planner to house delivery plans, SharePoint EDRM for documents and records relating the project and (ultimately) a power BI interface for accessing reports and insights.

Why are we doing this?

We currently rely on admin heavy processes and individual spreadsheets for the corporate reporting on projects, which can make 'joining the dots' more challenging and risk a lack of visibility. For example, our transformation programmes are collectively delivering £5m RoI; tracking our collective progress against this will not be possible through silo'd data management.

We need to shift from a "spreadsheet" to administrate a "central database" for reporting on the transformation portfolio, programmes, and projects.

To do this we need to create an intuitive and consistent interface for collecting and updating reporting information relating to transformation portfolio, programmes, and projects.

We have previously explored moving to one tool for project management, but we did not find one application that met all requirements. MS Planner can manage milestones, tasks, and timelines however it does not support risk or benefit management, or the more 'narrative' elements of project and programme updates such as health reporting or budget confidence. These are essential to the management of our transformation portfolio, and therefore we are using the technology stack available to us, and customising to ICO requirements. To enable a consistent approach to reporting and production of high-quality data that meets assurance standards and colleagues have confidence in.

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. Applies to working practices for project professionals and PMO as well as those using / receiving the reporting outputs of the transformation portfolio.

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

Please answer - 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 impact – the app does not ask or hold any information relating to individual's religion or beliefs.	
Race, nationality or cultural background	No impact – the app is available to all project professionals or those who require access to the information. Personal data except for colleague's name is not held.	
Disabled people or Neurodivergent	Yes – mitigations have been provided where impacts have been detected as potential barriers. There may also be positives by design.	Impacts have been detected for people with neurodiverse and accessibility needs, such as: **Sensory overload**: Mitigated by avoidance of flashing animations, auto-playing media, bright colours. **Cognitive load and unpredictable interface**: Mitigated by consistent navigation and form layout, links highlighted in blue and

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.
		underlined, prompt reminders with description of what data is required. Clear instructions – use of a data dictionary, training on a 1-2-1 basis and options for ongoing support as required. Use of sections on forms with data grouped logically. **Time constraints**: Time-limited tasks are minimal. Notice provided for when a report is due via calendar reminder. Support from PMO if required to support the completion of time limited report. Calendar reminders in place. **Ability to personalise settings within application:** Individuals can personalise their settings to meet specific requirements, such as: Number of rows displayed can be changed to min of 25 – max 250. Enable high contrast. Zoom in and out browser settings can be set and apply to application. **Writing & Generating Content** Heavy use of drop-down selections with pre-populated options, free text fields minimised. Co-pilot form assist will predict based on previous selections. **Accessibility testing**

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.
		Application testing completed by DDaT test team recorded three observations, two related to the visible focus indicator (does not indicate some of the fields which are locked) and the third suggested that placeholder text could be added within the date field to provide some guidance to the user. Project Central - Power Apps - Accessibility checks1.xlsx
Sexual orientation	No impact	
Sex (see note 1)	No impact	
Age	No impact	
Gender reassignment (see note 2)	No impact	
Marital status	No impact	
Pregnancy and maternity	No impact	
Political opinions	No impact	
People with dependants	No impact	
People without dependants	No impact	

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.
Socio-economic groups or social classes (see note 3)	No impact	
Multiple protected characteristics (see note 4)	No impact	

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 (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).

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 No – although colleagues who are contracted to the Wales office may use the tool, there is no external facing interface. Internal systems are set to English base language centrally.

*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 .*

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

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	No contribution

Objective	Contribution to objective
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.	
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.	The app was developed in response to requests from colleagues for project and programme tasks to be more consistent and guided, as well as in response for an organisational need for visibility of the transformation we conduct. Clarity provided as to what data and information is required and provides visibility of portfolio in one place. Will remove manual reporting processes and the need to ask colleagues to complete information multiple times in various places, leading to time saving efficiencies. Increasing the organisational ability to 'self-serve' when seeking information about our projects and programmes should reduce pressure on transformation colleagues and better empower them to be themselves.
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	No contribution

Objective	Contribution to objective
experience vulnerability and communities of unmet need.	

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: The PMO team are responsible for developing the Project Central app, and the associated reporting that will be fed by the data. As the tool is embedded into normal working practices, colleagues are supported by PMO through individual training sessions and opportunity to attend know abouts, team meetings, one to one catch ups to support individuals use of project central as required.
We recognise that the introduction of this tool is a change for colleagues, we are managing this as a localised change, impacting roles in slightly separate ways e.g. Project Professionals, Sponsors, Finance, PMO, Procurement. A change impact assessment has been completed and actions associated with implementing the change integrated into the PMO change and comms planning activities.
A backlog of feedback, identified bugs and further enhancements will inform future development and prioritisation of changes to the app. Where backlog items are implemented, this will be shared via the project community on Viva Engage. The PMO offer ongoing support options using PMO email address, team meetings, weekly programme assurance meetings, and any additional training and guidance required. A feedback form has been developed which will actively encourage user opinions and feedback on the tool. PMO will publicise new features through a release note and assist with any queries that arise.
This EqIA will be built upon as and when with considerations being reviewed as development continues.

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, or upon any release that introduces a major change (e.g., new functionality). A minor change would be an enhancement of, or change to, existing functionality.

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: AF
Date: 21/10/2025

Approved by line manager:

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	V1.0
Status	First full
Relevant or related policies	Equality Impact Assessment Guidance
Author/owner	AF
Approved by	ED
Date of sign off	26/10/25
Review date	26/10/26

Version	Changes made	Date	Made by