

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: Mary Jervis

What is the title of this piece of work? Data Protection Essentials

Briefly describe the overall purpose of this work.

Data Protection Essentials consists of three elements:

Data protection training for SME staff, focusing on the issues small organisations face on a day-to-day basis, rather than an exhaustive grounding in all aspects of information rights law.

Self-assessment checklist to help the SME assess their own compliance and understand what they need to do to improve.

A public demonstration of their commitment to complying with DP rules via an entry on a public register, a badge/certificate of completion.

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~~.

*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~~.

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	Positive impact – Training provides examples and guidance to have consideration to special category data and criminal offence data, which will include protected characteristics	Reduced negative impact - we have used diverse characters to bring examples to life, taking care to avoid stereotypes. Timescale – by launch date and ongoing review of feedback.
Race, nationality or cultural background	Positive impact – Training provides examples and guidance to have consideration to special category data and criminal offence data, which will include protected characteristics	Reduced negative impact - we have used diverse characters to bring examples to life, taking care to avoid stereotypes. Timescale – by launch date and ongoing review of feedback.

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.
Disabled people	<p>Positive impact – Training provides examples and guidance to have consideration to special category data and criminal offence data, which will include protected characteristics</p> <p>Negative impact – usability of the product for people with physical or health cognitive impairments</p> <p>Negative impact - Neurodivergent people may find a site with a lot of content, features and colours to be overwhelming or distracting and therefore have a less equitable experience or be less likely to use the service.</p>	<p>Reduced negative impact - we have used diverse characters to bring examples to life, taking care to avoid stereotypes.</p> <p>Reduced negative impact -</p> <ul style="list-style-type: none"> - Accessibility included in the procurement process as a MUST. - Preferred supplier incorporates accessibility at all stages of development - Inclusive user research and testing to take place at all stages of development - Universal barriers assessment to take place to identify potential barriers to use. <p>Timescale – by launch date and ongoing review of feedback.</p> <p>Reduced negative impact - making design decisions on the platform that elevate this risk and mitigate where possible.</p> <p>Timescale – by launch date and ongoing review of feedback.</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.
Sexual orientation	Positive impact – Training provides examples and guidance to have consideration to special category data and criminal offence data, which will include protected characteristics	Reduced negative impact - we have used diverse characters to bring examples to life, taking care to avoid stereotypes. Timescale – by launch date and ongoing review of feedback.
Sex (see note 1)	<p>Positive impact – Training provides examples and guidance to have consideration to special category data and criminal offence data, which will include protected characteristics</p> <p>Negative impact - Women users are more likely than men to doubt their own ability. This might mean they downplay how well they are applying DP in practice and therefore more likely to get a "working towards completion" in the self-assessment.</p>	<p>Reduced negative impact - we have used diverse characters to bring examples to life, taking care to avoid stereotypes. Timescale – by launch date and ongoing review of feedback.</p> <p>Mitigations – to make sure we are designing the self-assessment in such a way that gives them confidence in the answers. Timescale – by launch date and ongoing review of feedback.</p> <p>Build confidence during engagements with women participants eg in advisory checks or contact with our live services. Timescale – ongoing post launch.</p>
Age	Negative impact – Usability of the product for those with lower levels of digital literacy and confidence.	<p>Reduced negative impact.</p> <ul style="list-style-type: none"> - Inclusive user research and testing to take place at all stages of development

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.
	Negative impact - Age is often a factor in people's levels of digital literacy: Adults' media use and attitudes 2025	<ul style="list-style-type: none"> - Universal barriers assessment to take place to identify potential barriers to use. Timescale – by launch date and ongoing review of feedback.
Gender reassignment (see note 2)	Positive impact – Training provides examples and guidance to have consideration to special category data and criminal offence data, which will include protected characteristics	Reduced negative impact - we have used diverse characters to bring examples to life, taking care to avoid stereotypes. Timescale – by launch date and ongoing review of feedback.
Marital status		
Pregnancy and maternity	Positive impact – Training provides examples and guidance to have consideration to all special category data and criminal offence data, which will include protected characteristics	Reduced negative impact - we have used diverse characters to bring examples to life, taking care to avoid stereotypes. Timescale – by launch date and ongoing review of feedback.
Political opinions	Positive impact – Training provides examples and guidance to have consideration to all special category data and criminal offence data, which will include protected characteristics	Reduced negative impact - we have used diverse characters to bring examples to life, taking care to avoid stereotypes. Timescale – by launch date and ongoing review of feedback.
People with dependants	Negative impact – less time to complete the training due to caring responsibilities	Reduced negative impact - design the service so people aren't under undue time pressures and can be flexible in when and how they

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		complete it eg save and return options, short modules etc. Timescale – by launch date and ongoing review of feedback.
People without dependants		
Socio-economic groups or social classes (see note 3)	<p>Negative impact – understandability issues with the content.</p> <p>Socioeconomic disadvantage is strongly associated with disparities in literacy, which can mean some user will have younger reading ages.</p> <p>Negative impact - As the platform is web based, people need to have good internet connection – this might impact people from rural areas more or those without internet access in their home (ie people with lower incomes or older adults).</p>	<p>Reduced negative impact</p> <ul style="list-style-type: none"> - Make sure the content is written in plain English and is clear and concise. - Use videos, with transcription, to support different styles of learning. - Test the content with users - Review content in QA platform (eg Silktide) and aim for the reading age to be 14 y/o or below. - Undertake universal barriers assessment to identify potential barriers to use of the service. <p>Timescale – by launch date and ongoing review of feedback.</p> <p>Reduced negative impact – Training and self-assessment are designed to be self-paced, and in bitesize sessions. Participants can complete at their own pace, saving progress</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.
		as they go. Users can complete at times when internet connection is available. Timescales – ongoing review of feedback.
Multiple protected characteristics (see note 4)		

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

*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 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: The programme will be developed in English initially, with a plan to provide a Welsh version in a future iteration. A Welsh version of the product was included as a 'should' requirement in the recent procurement. Discussions with colleagues in Public Affairs Wales were initiated before the pilot in 2022 and continue.

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 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</p>	<ul style="list-style-type: none"> - Sector specialists from Business Services have used their creativity, knowledge, interactions and experience in their sectors to create sector specific examples. This will bring the modules to life via sector specific examples based on a fictional town. Sectors represented are:

Objective	Contribution to objective
<p>the most effective and have the greatest impact when we are representative and consider different perspectives.</p>	<ul style="list-style-type: none"> - Charities, professional services (including finance and insurance, education and childcare, general business retail, and health.
<p>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.</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>	<ul style="list-style-type: none"> - All scripts and supporting documents have been created with accessibility as default. This will help internal colleagues, when reviewing documents, as well as our supplier. - Inclusive language has been used. - We have used videos, with transcription, to support different styles of learning. - We have meetings with colleagues to discuss scripts, ideas, issue as an alternative to written form. - Sector examples have been sent to internal reviewers, including Public Affairs Wales, Scotland and Northern Ireland to ensure regional variations are reflected accurately. -
<p>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</p>	<p>SME DE has been created to help SMEs comply with the information rights laws. Research tells us that unlike their larger counterparts SMEs do not typically have in house expertise to help them maximise their use of personal information.</p> <p>We used data to inform the sectors we focused on for our examples. Still today the sectors listed above are the most frequent contacts to the ICO for support. The support includes for personal data breaches, enquiries and complaints made by the public.</p>

Objective	Contribution to objective
need.	Accessibility is included at each stage, including being available across a range of devices and with assistive technology.

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 number of metrics from within and outside the platform are being worked up.

Q8. How long will these arrangements be in place?

Answer: For the duration of the use of the platform.

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: Following the launch in March 2026, it should be reviewed 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: The EqIA can be published without 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:

<i>Signed by:</i> Mary Jervis <i>Date:</i> 4 September 2025
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Approved by line manager:

<i>Signed by:</i> Faye Spencer <i>Date:</i> 11 September 2025
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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	
Status	

Relevant or related policies	Equality Impact Assessment Guidance
Author/owner	
Approved by	
Date of sign off	
Review date	

Version	Changes made	Date	Made by