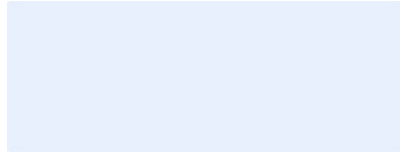


**Insert Name of Public Authority Here and Logo in Picture Box Below**



**Public Authority Statutory Equality and Good Relations Duties  
Annual Progress Report**

**Contact:**

<ul style="list-style-type: none"><li>Section 75 of the NI Act 1998 and Equality Scheme</li></ul>	Name: Caroline Mooney Telephone: 0330 414 6431 Email: caroline.mooney@ico.org.uk
<ul style="list-style-type: none"><li>Section 49A of the Disability Discrimination Act 1995 and Disability Action Plan</li></ul>	As above x (double click to open) Name: Telephone: Email:

Documents published relating to our Equality Scheme can be found at:

<https://ico.org.uk/about-the-ico/our-information/equality-and-diversity/>

**Signature:**



**This report has been prepared using a template circulated by the Equality Commission.**

**It presents our progress in fulfilling our statutory equality and good relations duties, and implementing Equality Scheme commitments and Disability Action Plans.**

**This report reflects progress made between April 2020 and March 2021**

## **PART A – Section 75 of the Northern Ireland Act 1998 and Equality Scheme**

### **Section 1: Equality and good relations outcomes, impacts and good practice**

- 1** In 2020-21, please provide **examples** of key policy/service delivery developments made by the public authority in this reporting period to better promote equality of opportunity and good relations; and the outcomes and improvements achieved.

*Please relate these to the implementation of your statutory equality and good relations duties and Equality Scheme where appropriate.*

The Information Commissioner's Office (ICO) is the UK's independent public body set up to promote access to official information and protect personal information. This is achieved by promoting good practice, ruling on complaints, providing information to individuals and organisations and taking appropriate action when the law is broken.

Our **mission** is to uphold information rights for the UK public in the digital age.

Our **vision** is to increase the confidence that the UK public have in organisations that process personal data and those which are responsible for making public information available.

A significant part of our role is to be responsible for the regulation of a number of pieces of legislation. These are:

The **Data Protection Act 2018** (DPA 2018) and the **General Data Protection Regulation** (GDPR) both commenced in May 2018 and build on and enhance the rights of individuals relating to personal data; including the right to know what information is held about them and the right to correct information that is wrong. The legislation also obliges organisations to manage the personal information they hold in an appropriate way. The GDPR was replaced by the **UK General Data Protection Regulation** (UK GDPR) following the UK's exit from the European Union.

The **Freedom of Information Act 2000** (FOIA) gives people a general right of access to information held by most public authorities. Aimed at promoting a culture of openness and accountability across the public sector it enables a better understanding of how public authorities carry out their duties, why they make the decisions they do and how they spend public money.

The **Environmental Information Regulations 2004** (EIR) provide an additional means of access to environmental information. The EIR cover

## **PART A – Section 75 of the Northern Ireland Act 1998 and Equality Scheme**

### **Section 1: Equality and good relations outcomes, impacts and good practice**

more organisations than FOIA, including some private sector bodies, and have fewer exemptions.

The **Privacy and Electronic Communications Regulations 2003** (PECR) regulate the use of electronic communications for the purpose of unsolicited marketing to individuals and organisations, including the use of cookies.

The **Network and Information Systems Regulations 2018** (NIS) are derived from the European NIS Directive, which establishes a common level of security for network and information systems. These systems play a vital role in the economy and wider society, and NIS aims to address the threats posed to them from a range of areas, most notably cyber-attacks.

The **Infrastructure for Spatial Information in the European Community Regulations 2009** (INSPIRE) give the Information Commissioner enforcement powers in relation to the pro-active provision by public authorities of geographical or location-based information.

The **Re-use of Public Sector Information Regulations 2015** (RPSI) gives the public the right to request the re-use of public sector information and details how public bodies can charge for re-use and license the information. The ICO deals with complaints about how public bodies have dealt with requests to re-use information.

The **Investigatory Powers Act 2016** (IPA) imposes duties on communications service providers when retaining communications data for third party investigatory purposes where they have been issued with a notice from the Secretary of State. The Information Commissioner has a duty to audit the security, integrity and destruction of that retained data.

The **Electronic Identification and Trust Services for Electronic Regulations 2016** (eIDAS) sets out rules for the security and integrity of trust services including electronic signatures, seals, time stamps and website authentication certificates. The ICO has a supervisory role towards organisations providing these trust services, including being able to grant qualified status to providers and the ability to take enforcement action.

The **Enterprise Act 2002** sets various reforms to competition law and consumer law enforcement in the UK. Part 8 of the Enterprise Act deals with provisions for the enforcement of consumer protection legislation. The ICO has powers under Part 8 of the Enterprise Act as a “designated enforcer” in

## **PART A – Section 75 of the Northern Ireland Act 1998 and Equality Scheme**

### **Section 1: Equality and good relations outcomes, impacts and good practice**

relation to domestic and infringements listed in Schedule 13 of the Enterprise Act. The ICO is also a “Schedule 13” enforcer which gives us additional powers in relation to infringements listed in Schedule 13 of the Act.

The ICO is a UK wide organisation and we are committed to appropriately meeting the diverse needs of our many stakeholders and users of our services. We also wish to ensure that we provide an inclusive, diverse and fair working environment for our employees in England, Wales, Scotland and Northern Ireland.

At a strategic level the ICO remains committed to ensuring that equality and diversity issues are considered as part of the planning and conduct of our activities.

Our Information Rights Strategic Plan sets out our goals to be an effective and accessible regulator.

#### **Our strategic goals – 2016 to 2021**

1. To increase the public’s trust and confidence in how data is used and made available.
2. Improve standards of information rights practice through clear, inspiring and targeted engagement and influence.
3. Maintain and develop influence within the global information rights regulatory community.
4. Stay relevant, provide excellent public service and keep abreast of evolving technology.
5. Enforce the laws we help shape and oversee.
6. To be an effective and knowledgeable regulator for cyber-related privacy issues.

Central to all of these goals is a core mission to ensure that information rights are accessible and understood by all members of the community.

Our enforcement activity is geared towards protecting the public from misuse and abuse of the law, and is frequently centred on the protection of vulnerable and protected groups.

Our key policy/service delivery developments are based on our approach to equality and diversity across the organisation.

## **PART A – Section 75 of the Northern Ireland Act 1998 and Equality Scheme**

### **Section 1: Equality and good relations outcomes, impacts and good practice**

The ICO has a regional office in **Northern Ireland**. Its role is set out below:

- To develop ICO's presence within Northern Ireland by engaging with local stakeholders.
- To foster awareness of information rights law and ICO guidance.
- To provide a local enquiry and advice service on information rights law for organisations and individuals.
- To identify local priorities and influence policy making within Northern Ireland.
- To contribute to the formulation of ICO guidance including by raising awareness of regional policy issues, local sensitivities and needs
- To undertake FOI casework alongside the team in our Head Office, primarily relating to public authorities based within Northern Ireland.
- To support regulatory action being taken in Northern Ireland.
- To comply with statutory equality duties

### **ICO Equality Objectives**

At the ICO we have **four** equality, diversity and inclusion objectives defined as follows:

- **Spreading knowledge and acting:** We will raise awareness of information rights across the community and take action to ensure that organisations fulfil their obligations. We will particularly focus on groups and sectors where knowledge gaps may cause information rights inequalities or vulnerabilities. We will ensure that our actions as a regulator do not create inequalities or unlawfully discriminate.
- **Accessible services:** 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.
- **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.
- **Employer:** Our workplaces and practices will be accessible, flexible, fair and inclusive. We will value the diversity, skills, backgrounds and

## **PART A – Section 75 of the Northern Ireland Act 1998 and Equality Scheme**

### **Section 1: Equality and good relations outcomes, impacts and good practice**

experience of our people, enabling them to perform to their best in a welcoming and supportive environment.

These objectives aim to ensure that the ICO is an inclusive, accessible and diverse regulator, service provider and employer. This will help all members of society to have awareness of, and access to, their information rights and receive appropriate protection if their rights are infringed.

Our **Equality, Diversity and Inclusion (EDI)** Board oversees our efforts to provide an increasingly accessible service for our customers and workplace for our staff.

Alongside the EDI Board, we have **five staff networks**:

- **Women and Allies** focused on gender equality, this network aims to encourage, empower and support women in their careers at the ICO and beyond.
- **Healthy minds** focused on the importance of good mental health, this network aims to raise awareness and challenge the perceived social stigma linked to mental and emotional health issues, including stress, depression and anxiety.
- **REACH**, this abbreviation stands for Race, Ethnicity, and Cultural Heritage, with this network focused on raising awareness of issues of race, ethnicity and cultural heritage at the ICO and in the wider community and celebrating diversity.
- **Pride** focused on supporting LGBTQ+ colleagues, raising awareness and celebrating diversity, this network aims to promote a safe, inclusive and diverse working environment that encourages respect and equality for all.
- **Network for Access and Inclusion** focused on improving the experience of disabled staff and customers at the ICO, this network promotes positive attitudes towards disabled people and raises awareness of disability equality by identifying and removing barriers to inclusion.

During 2020-21, the ICO's **EDI Board** has focused on six distinct workstreams:

- ICO People Policy Review
- Equality Impact Assessment Process Review
- Develop an EDI Training plan
- Improve our diversity data

## **PART A – Section 75 of the Northern Ireland Act 1998 and Equality Scheme**

### **Section 1: Equality and good relations outcomes, impacts and good practice**

- Commission an independent EDI audit
- Establish an ICO Corporate Social Identity

The focus of the Board is one of scrutiny and oversight of this work, with many of the EDI Board members chairing and/or attending sub-groups and working collaboratively with colleagues from across the organisation to further this work.

A detailed report on each workstream is set out in the response to Question 3.

On a general level across the UK we provide our staff with a work environment and IT systems which help meet a range of needs; including accessible offices and IT systems, flexible and part-time working (to help work-life balance). This has resulted in all ICO staff members being provided with a new device which enables them to work from any location in a secure and agile way. This has allowed staff to work in the way which best suits them and has been particularly important in our response to the COVID-19 pandemic, as it allowed us to smoothly transition to remote working.

We aim to recruit from a range of backgrounds and take the applicant-anonymous approach when assessing candidates for employment.

In addition to the above some notable key policy/service delivery initiatives in 2020/2021 included;

- ICO set out its expectations on how contact tracing solutions should be developed in line with the data protection standards while appearing before the Joint Committee on Human Rights.
- Formal Opinion published setting out current thinking on Google and Apple's joint tracing initiative.
- ICO published its reshaped priorities, focused on protecting the public interest, enabling responsible data sharing and monitoring intrusive and disruptive technology.
- ICO reopens the regulatory sandbox with a focus on children's privacy and data sharing.
- Age Appropriate Design Code comes into effect.
- ICO supports Safer Internet Day 2021 by highlighting the importance of protecting children within the digital world.
- We have continued to work closely with the recognised trade unions as well as with our Equality, Diversity and Inclusion staff networks

**PART A – Section 75 of the Northern Ireland Act 1998 and Equality Scheme**

**Section 1: Equality and good relations outcomes, impacts and good practice**

and the staff forum to engage with and listen to our employees. Keeping in touch with all our staff through virtual town hall events led by the Executive Team, regular email updates from the team leading our pandemic response and departmental/team meetings have been key to ensuring staff felt informed about how we were going to continue delivering services to our customers and stakeholders.



- 2** Please provide **examples** of outcomes and/or the impact of **equality action plans/** measures in 2020-21 (*or append the plan with progress/examples identified*).

This section of the report builds on the previous question about policy and service delivery initiatives that have contributed to a more equal society. We note also that in previous reports we detailed many initiatives with regard to our workplace policies and initiatives that included disability issues in recruitment, reasonable adjustments, variable formats in information, our Live Chat service, access to parking, staff wellbeing and parental leave and Equality and Diversity factsheets. We also provided reports on enforcement activity that benefited the most vulnerable groups in society. These examples are still very much relevant and the examples below build on the work of previous years.

Central to our strategic goals and equality objectives set out in the previous section is a core mission to ensure that information rights are accessible and understood by all members of the community. This was enhanced in the context of the public health crisis. In addition to our broader work protecting people's rights throughout the pandemic, we identified the risk of COVID-19-related scams and frauds, targeted at vulnerable people. This was a major area of focus for the ICO from an early stage, protecting the public in a regulatory space that might typically see the overlap of data misuse and breach of the Privacy and Electronic Communication Regulations covering nuisance calls and texts.

We worked alongside Action Fraud, Trading Standards, law enforcement and other relevant agencies to protect people. Our work included educating people around the risk of these scams and offering tips on what to look out for. In addition we have provided privacy information to the public around COVID-19-related issues. This included informing people of their rights around contact tracing, testing and health data sharing. We also warned people of the risks of fraudsters looking to take advantage of the pandemic.

Our enforcement activity is geared towards protecting the public from misuse and abuse of the law, and is frequently centred on the protection of vulnerable and protected groups.

During the year we acted against companies who used nuisance marketing calls and texts to play upon people's concerns at a time of great public uncertainty. We issued a penalty of £60,000 to a firm that sent text messages promoting a hand-sanitising products, and penalties totalling £110,000 to three companies who sent unlawful marketing messages to sell face masks.

Our work to protect younger people, such as the Age Appropriate Design Code, seeks to safeguard some of our community's most vulnerable people at a time when the advancement of technology means that privacy can be impacted upon in ways which were never possible before.

Coupled with our organisational values (set out in the previous section), which are part of our People Strategy, we aim to enhance the services we

- 2 Please provide **examples** of outcomes and/or the impact of **equality action plans/** measures in 2020-21 (*or append the plan with progress/examples identified*).

provide to the public and stakeholders, whilst continuing to be a supportive employer.

### **Belfast ( Northern Ireland) office of ICO Equality outputs 2020-21**

Throughout 2020/21, we provided support to both people and organisations through our regional helpline and advice service. This ensured that all people were aware of their rights under the legislation that we regulate and could contact our helpline if in need of advice around these rights. **Equality categories impacted: All.**

Throughout 2020-21, the Northern Ireland (NI) office of the ICO engaged extensively with the Department of Health, Public Health Agency and the wider Health and Social Care sectors in NI in terms of their Covid 19 response. We provided advice and guidance on the information governance aspects of the development of this work to include testing, manual and digital contact tracing solutions, data sharing and exit strategy. This enabled recognition of the data protection implications of this work and that appropriate safeguards would be put in place to cover these activities. **Equality categories impacted: All.**

During quarters 1 and 2 of 2020-21, we were engaged with Department of Health from the project initiation stage of the StopCovidNI Proximity app. The intention of the app was that people with Coronavirus symptoms could use the app to send anonymous alerts to other app users, notifying them that they had been in close proximity to someone who may be infected. Early engagement in the process allowed the ICO to offer insight into ensuring data protection was at the core of the design of the app. We set out our expectations on how contact tracing solutions may be developed in line with the principles of data protection by design and default which were used from the early stages and throughout the development of the app by the Department. **Equality categories impacted: All.**

After the proximity app was launched amongst adults in NI, we provided regulatory advice and guidance to DoH on the further roll out of the app amongst secondary school age children. The Department opened up this functionality in order to identify close contacts and help contact tracing efforts amongst this age group and in schools. Owing to their age and vulnerability, children merit additional protection in terms of their personal data and this was reinforced through all the regulatory guidance provided by the ICO. **Equality categories impacted: All.**

- 2 Please provide **examples** of outcomes and/or the impact of **equality action plans/** measures in 2020-21 (*or append the plan with progress/examples identified*).

In April 2020, we provided advice and guidance to the Department for Communities (DfC) on data protection compliance for a data sharing initiative to ensure the supply of food and basic supplies to those who have been advised by their GP to shield due to pandemic ( i.e. high risk clinical groups). **Equality categories impacted: All, in particular persons with/without disabilities and age.**

We engaged with NI Department for Economy and the NI Executive Office to consult about the publication of NI specific guidance relating to how businesses can re-open safely in NI. We provided regulatory advice and guidance in respect to keeping customer logs in the hospitality sector to assist manual contact tracing efforts, temperature testing and collecting children's data. **Equality categories impacted: All.**

We consulted with the Departments of Health and Justice on the proposed establishment of a regional Care and Justice Campus for children and young people in Northern Ireland. **Equality categories impacted: Age.**

Throughout 2020-21, we met with Dept of Education and consulted on the new Special Educational Needs (SEN) framework and the data protection implications in this area. **Equality categories impacted: All, in particular persons with/without disabilities.**

We carried out various other pieces of consultation work, responding to formal public consultations throughout 2020-21, to include; the Legislative options to inform the development of an Adult Protection Bill for Northern Ireland and the Consultation on Cross Departmental Covid-19 Vulnerable children and Young People's Plan. We provided our views, advice and guidance on the safeguarding of personal data of children and vulnerable individuals, data sharing as well as areas of wider DP compliance . **Equality categories impacted: Age and those with dependants.**

- 3** Has the **application of the Equality Scheme** commitments resulted in any **changes** to policy, practice, procedures and/or service delivery areas during the 2020-21 reporting period? (*tick one box only*)

Yes                       No (go to Q.4)                       Not applicable (go to Q.4)

Please provide any details and examples:

In addition to the progress reported above the Equality, Diversity and Inclusion Board examined the progress made, from an equalities perspective in terms of the equality objectives of the ICO.

### **Objective 1: Spreading knowledge and taking action**

Over the past year Assurance (Supervision) have published a wide range of supervisory guidance products designed to help organisations fulfil their obligations for data protection. This includes a wide ranging privacy management programme (our accountability framework) for organisations. It is a free to use resource that can benefit any size organisation. It includes templates and collected resources to support data protection compliance reducing the need for smaller organisations to rely on consultants, incurring extra costs. The practical support also helps to reduce inequalities that may arise as a result of knowledge gaps and resources between organisations responsible for protecting people's data.

We produced detailed guidance about how organisations should comply with one of the most fundamental provisions of Data Protection law - **subject access requests** – helping ensure that organisations are informed on how to ensure individuals can access their data. This included guidance on dealing with requests from disabled people & requests from children.

Early on in the pandemic we identified an issue relating to vulnerable adults power of attorney and making your wishes clear regarding your data in the absence of power of attorneys (PoAs). At the start of the pandemic people lost access to their usual support networks through lockdown restrictions leaving many elderly and disabled people without support. We produced some guidance making it clear what information people with PoAs should be able to access and we also produced guidance about what individuals could do to make their wishes about who could access their data in the absence of PoA. We worked with the Law Society and GMC on this to best understand the issues and to make sure relevant professional bodies were aware of the guidance.

We also provided substantial feedback that went into the ICO's response to government consultation on a Data Strategy which included highlighting the potential for some proposals to discriminate against more vulnerable members of society.

A communication and engagement plan is in development to raise awareness among children and parents of their data protection rights and the role of the children's code in providing greater protection for their data online. This is particularly important as children are likely to need tailored

information to understand and exercise their rights. We will be reaching out to these audiences before the end of the transition period this year, and have been working with a range of children's representatives through our Children's Advisory Panel to ensure we target this engagement appropriately.

In our work in Tech and Innovation to promote and support privacy respectful innovation we have partnered with other organisations in projects to improve data protection practice in markets dealing with vulnerable groups. Examples include:

- We mentored participants in the FCA Digital Sandbox Pilot looking for ways to prevent frauds and scams and to improve the financial resilience of vulnerable consumers
- We supported Innovators working with Nesta's Rapid Recovery Challenge to find solutions to problems encountered by those made economically and financially vulnerable as a result of the pandemic.

The ICO's chairing of the Global Privacy Assembly (GPA) has continually focussed on ensuring a diversity of contributors across all of the project's workstreams since 2018. This means that the ICO has had to collect and reflect a range of views in its activity which reflect the cultural, legal and linguistic diversity from amongst the 132-strong membership, as well as ensuring gender balance in its output. Diversity has been constantly integrated into our approach in developing agendas and offering interpretation for the GPA events, creating a diverse GPA Executive Committee and the set up of a new GPA Reference Panel.

### **Objective 2: Accessible services**

Through our Grants programme we supported Connection at St Martin's in the Field in a project to engage with those experiencing homelessness to better understand the challenges and barriers they faced in understanding how their data was used. As well as producing high quality research into the experience of individuals, the project delivered a practical and accessible tool set designed around the needs of data subjects, informing homeless people of their data rights and how to enforce them. It also created an outreach process that will be shared across charity networks experiencing similar challenges.

Following the success of this project, one of the categories in the third phase of our research grants programme asks for applications that target Data protection issues and solutions for vulnerable adults and communities.

The Children's code aims to provide additional protections to children, who are likely to be less able to control or understand the ways in which their data is being used. The code completed its parliamentary passage in September 2020, and we are now in the twelve month transition period before the Code comes into force. We are working closely with ISS under scope of the code to ensure that they consider the best interests of children as part of the design and functionality of their services, building in high levels of protection by default.

### **Objective 3: Encouraging others**

Procurement are reviewing their process and EDI screenings will be routinely considered and undertaken where appropriate. Supporting documentation and guidance will be in place by 30 September 2021. We are also exploring further opportunities to ensure that our supply chain reflects our EDI posture.

In our Regulatory Sandbox we undertook a project with Onfido to assist the development of mechanisms to combat inherent bias within AI, and to do so in a way that protects privacy. We have also supported a project with JISC looking to use sophisticated data analysis in order to support student mental health and wellbeing and potentially intervene with students that are vulnerable.

In our work to support the development of GDPR Codes of Conduct we have been working with The National Association of Child Contact Centres as they develop their code. This code deals with child contact centres for the children of separated families to have contact with their non-resident parents / other family members, in a safe environment. Specific 'supervised' centres are used for if there are concerns regarding the safety of the children. Centre delivery ranges from medium sized charities with full time staff, to small local community centres and church halls. The contact centres need to have regularly updated advice and support on compliance with personal data handling requirements. The NACCC code of conduct is intended to provide assurance to users, supporters, public, government bodies etc, that personal data handling in this sector is maintained to the required standard.

### **Objective 4: Employer**

During 2020-21, the ICO's EDI Board has focused on six distinct workstreams:

- ICO People Policy Review
- Equality Impact Assessment Process Review
- Develop an EDI Training plan
- Improve our diversity data
- Commission an independent EDI audit
- Establish an ICO Corporate Social Identity

The focus of the Board is one of scrutiny and oversight of this work, with many of the EDI Board members chairing and/or attending sub-groups and working collaboratively with colleagues from across the organisation to further this work.

### **ICO People Policy Review workstream**

Over the last 12 months, members of the EDI Board and Staff Network groups have had the opportunity to comment upon a range of ICO people (staff) related corporate policies. This has helped to ensure that the policies are inclusive and takes into account issues which may impact upon people from different protected groups. The next steps are to work with HR where there are potential gaps in the current policy suite.

### **Equality Impact Assessment process review**

The EDI Board reviewed the ICO's Equality and Impact Assessment (EQIA) process to ensure that the process, template and guidance documents were fit for purpose, met equality legislation, adhered to the Public Sector Equality Duty and mirrored best practice.

To ensure that the new EQIA process feels relevant to all ICO staff and to help emphasise the importance of measuring and assessing the impact on equality; the ICO has rebranded the EQIA process as the People Impact Assessment (PIA) process. This mirrors developing best practice approaches across both the public and private sectors.

### **Develop an EDI Training plan**

The focus for EDI training over the last 12 months has been delivery of our existing mandatory Dignity, Diversity & Inclusion workshop which all ICO new starters attend and introducing new course, such as:

- Mental Health for People Managers.
- Awareness of mental health and autistic spectrum disorder
- Interviewing and selection workshops
- World mental health day
- World suicide prevention day
- Menopause for colleagues
- Menopause for managers
- Mental Health for everyone
- Mental Health for Managers

### **Improving our diversity data**

The EDI Board reviews the demographic information of the ICO's staff on a regular basis and has established ambitions for how the ICO's staffing profile will change in the next three years to March 2024.

The EDI Board did not establish specific ambitions for the age or religion/belief demographics for the ICO's staff, though we wish to ensure that our employment practices are as fair and inclusive as possible to ensure that we are able to attract and retain people from different characteristics.

It is worth noting that there has been some movement in the demographics of the organisation in the last 12 months with small increases in the percentage of ICO staff from an ethnic minority background and staff that declared they are disabled. Although there has been progress in that time, our ambitions are stretching and there is much further work to be done if we are to achieve them. An updated action plan to meet these targets is to be taken to our next EDI board in Q1 20/21.

The EDI Board will continue to monitor this data and seek to identify opportunities to increase the diversity of our workforce.

### **Commissioning an independent EDI audit**

As part of our continuing commitment to putting equality, diversity and inclusion at the heart of everything we do, the EDI Board has commissioned

Diversity McKenzie to conduct an independent Equality Audit to commence in May 2021.

The audit will cover:

- Policies and Procedures
- Learning and Development/Training
- Equality Impact Analyses
- Inclusiveness of services we provide
- Inclusiveness of leadership
- Procurement Processes
- HR Processes
- Recruitment Processes
- Pay Equality
- Bullying and Harassment

To be successful cross office support and engagement will be required. We are committed to publishing this report and anticipate that the findings and recommendations, will feed into the focus of the EDI Board for 2021/22 and its future workplan.

### **The ICO Corporate Social Identity**

In 2020 the EDI Board commissioned a subgroup of the Board to focus on the development of a corporate framework to promote, respond and engage with social and ethical issues, ensuring that the ICO is able to quickly and appropriately respond to social and ethical issues that may impact on staff, customers and stakeholders.

During this year, there has been a strong focus on the language we use across the organisation with guidance being issued on the terms 'whitelisting' and 'blacklisting' and agreement to stop the use of the acronym BAME, instead to use 'ethnic minority'.

The corporate 'Keeping it simple' and 'Writing to influence' training has also been updated with these considerations in mind.

There has been an increased focus on EDI communications internally, with more opportunities to share the work of the networks, raising the profile of the networks and engaging people in their activities.

**3a** With regard to the change(s) made to policies, practices or procedures and/or service delivery areas, what **difference was made, or will be made, for individuals**, i.e. the impact on those according to Section 75 category?

Please provide any details and examples:

This has been covered extensively in question 1, 2 and the first part of 3. The ICO aims to ensure that its approach to policies, procedures and the work environment are inclusive by design and therefore further equality for many groups. When developing new policies and systems of work we pay due regard for equality considerations.



The previous questions provide a range of examples including the development of the five staff networks;

- **Women and Allies** focused on gender equality
- **Healthy minds** focused on the importance of good mental health,
- **REACH**, addressing Race, Ethnicity, and Cultural Heritage
- **Pride** focused on supporting LGBTQ+ colleagues
- **Network for Access and Inclusion** addressing the needs of disabled staff and customers at the ICO.

In addition, in the context of the pandemic we identified an issue relating to vulnerable adults power of attorney and worked with the law society in addressing this. Our work with children continues with the Age Appropriate Design Code and promotion of a safer internet. The previous questions set out many more examples of how people with equality characteristics have benefited from ICO policy and procedures.

**3b** What aspect of the Equality Scheme prompted or led to the change(s)? *(tick all that apply)*

- As a result of the organisation's screening of a policy *(please give details):*
- As a result of what was identified through the EQIA and consultation exercise *(please give details):*
- x As a result of analysis from monitoring the impact *(please give details):*

The ICO is a UK wide organisation and develops its policies and services in a way that furthers equality in accordance with requirements in all jurisdictions. We review and monitor policies and services and adapt and adjust accordingly to ensure we are sensitive to the needs of our staff and customers. We use our Equality Forum and staff networks to help focus on areas of need including gender issues, race, disability and sexual orientation.

- As a result of changes to access to information and services *(please specify and give details):*
- Other *(please specify and give details):*

**Section 2: Progress on Equality Scheme commitments and action plans/measures**

**Arrangements for assessing compliance (Model Equality Scheme Chapter 2)**

**4** Were the Section 75 statutory duties integrated within job descriptions during the 2020-21 reporting period? *(tick one box only)*

- Yes, organisation wide
- Yes, some departments/jobs
- No, this is not an Equality Scheme commitment
- No, this is scheduled for later in the Equality Scheme, or has already been done
- Not applicable

Please provide any details and examples:

The ICO is a UK wide organisation and staff have to comply with equality legislation and obligations across all UK jurisdictions. It has established an Equality, Diversity and Inclusion forum that ensures appropriate consideration of equality issues across those jurisdictions with a view to establishing a common standard and mainstreaming equality throughout the organisation.

Staff are required to work with integrity, without bias or maladministration and in accordance with the ICO's policies and procedures. This includes our Disciplinary Policy and Dignity and Work Policy which set out examples of unacceptable behaviour.

The concepts of equality and diversity are reflected within the organisation's Values Framework - a key area of which is 'fairness', and all staff are required to undertake Equality, Diversity and Inclusion/ Dignity at Work training when they start working with the ICO.

This is fully supported by our People Strategy which has a number of goals and actions that support staff and promote equality including the recruitment and retention of people who are disabled, efforts to increase the diversity of our workforce and providing enhanced opportunities for training, for example through the introduction of apprenticeships.

**5** Were the Section 75 statutory duties integrated within performance plans during the 2020-21 reporting period? *(tick one box only)*

- Yes, organisation wide
- Yes, some departments/jobs
- No, this is not an Equality Scheme commitment
- No, this is scheduled for later in the Equality Scheme, or has already been done

Not applicable

Please provide any details and examples:

Each directorate’s business plan now incorporates Equality and Diversity Objectives and departments are required to report on activity which has an equality dimension.

**6** In the 2020-21 reporting period were **objectives/ targets/ performance measures** relating to the Section 75 statutory duties **integrated** into corporate plans, strategic planning and/or operational business plans? (*tick all that apply*)

- Yes, through the work to prepare or develop the new corporate plan
- Yes, through organisation wide annual business planning
- Yes, in some departments/jobs
- No, these are already mainstreamed through the organisation’s ongoing corporate plan
- No, the organisation’s planning cycle does not coincide with this 2020-21 report
- Not applicable

Please provide any details and examples:

The approach developed by the ICO seeks to embed due regard to equality into strategic thinking. The work of the new Equality structures ensures that key information is fed into the Corporate process through the Senior Management participation in the forum. We also seek to embed equality and diversity further in the operational work of the ICO with local accountability resting with relevant departmental and project / activity leads, with involvement from staff across the organization through the equality structures.

**Equality action plans/measures**

**7** Within the 2020-21 reporting period, please indicate the **number** of:

Actions completed:	<input type="text" value="n/a"/>	Actions ongoing:	<input type="text" value="n/a"/>	Actions to commence:	<input type="text" value="n/a"/>
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Please provide any details and examples (*in addition to question 2*):

In Questions 1 and 2 of this document we have cited several examples of our plans and actions which promote equality issues within our Corporate strategy and People Strategy and which impact on improving equality and accessibility of our services and information rights for the public. These are embedded within our corporate plans and business plans. This is supported by a directive to all Departments to include equality and diversity objectives and actions within their business plans.

In addition we have sought to provide opportunities to engage disabled people in public life through our recruitment campaigns for senior management positions and positions on the Management Board of the ICO which encouraged applications from all members of the community.

- 8** Please give details of changes or amendments made to the equality action plan/measures during the 2020-21 reporting period (*points not identified in an appended plan*):

n/a

- 9** In reviewing progress on the equality action plan/action measures during the 2020-21 reporting period, the following have been identified: (*tick all that apply*)

- Continuing action(s), to progress the next stage addressing the known inequality
- Action(s) to address the known inequality in a different way
- Action(s) to address newly identified inequalities/recently prioritised inequalities
- Measures to address a prioritised inequality have been completed

The ICO's development of Equality, Diversity and Inclusion networks allows for a continued assessment of equality issues that can inform Senior Leadership Team strategic thinking and decision making. It's important to emphasise that inherent to our strategic goals is a core mission to ensure that information rights are accessible and understood by all members of the community. Examples of how these are addressed are set out in Section 1 and in Section 2.

### **Arrangements for consulting (Model Equality Scheme Chapter 3)**

- 10** Following the initial notification of consultations, a targeted approach was taken – and consultation with those for whom the issue was of particular relevance: (*tick one box only*)

All the time

Sometimes

Never

- 11** Please provide any **details and examples of good practice** in consultation during the 2020-21 reporting period, on matters relevant (e.g. the development of a policy that has been screened in) to the need to promote equality of opportunity and/or the desirability of promoting good relations:

Clearly the 2020-21 year was impacted by the public health crisis however we continued to consult on key issues, guidance and codes of practice where appropriate. We publicise our consultations through our website, newsletters and by targeting particular groups when that is relevant.

Our Consultation Policy sets out the timeframes used for consultations and stipulates that documentation is written in plain English and in a format compatible with the website's Browsealoud facility. Consultation documentation can also be made available in braille or audio format.

Our policy states that if face to face consultation sessions take place, the needs of participants will be fully considered and venues chosen which are fully accessible.

.

During 2020/2021 we consulted on a number of important issues that impact on the promotion of equality for a number of groups:

**Consultation on the draft Statutory Guidance:** We ran a consultation about an updated version of the Statutory guidance on how the ICO will exercise its data protection regulatory functions of information notices, assessment notices, enforcement notices and penalty notices.

This guidance is a requirement of the Data Protection Act 2018 and only covers data protection law under that Act. Our other regulatory activity and the other laws we regulate are covered in our Regulatory action policy (which is currently under review).

**ICO consultation on the role of data ethics in complying with the GDPR:** This consultation looked at data ethics and how they relate to the policies, processes and written procedures implemented to discharge obligations under the GDPR's 'accountability' principle. It also asked what publicly available data ethical frameworks are available and their effectiveness.

**Call for views: AI and data protection risk mitigation and management toolkit**

With this consultation we were seeking views to help shape and improve our AI and data protection risk mitigation and management toolkit.

**12** In the 2020-21 reporting period, given the consultation methods offered, which consultation methods were **most frequently used by consultees**:  
(tick all that apply)

- Face to face meetings
- Focus groups
- Written documents with the opportunity to comment in writing
- Questionnaires
- Information/notification by email with an opportunity to opt in/out of the consultation
- Internet discussions
- Telephone consultations
- Other (please specify):

Please provide any details or examples of the uptake of these methods of consultation in relation to the consultees' membership of particular Section 75 categories:

**13** Were any awareness-raising activities for consultees undertaken, on the commitments in the Equality Scheme, during the 2020-21 reporting period?  
(tick one box only)

- Yes       No       Not applicable

Please provide any details and examples:

**14** Was the consultation list reviewed during the 2020-21 reporting period? (tick one box only)

- Yes       No       Not applicable – no commitment to reviewx

**Arrangements for assessing and consulting on the likely impact of policies (Model Equality Scheme Chapter 4)**

[Insert link to any web pages where screening templates and/or other reports associated with Equality Scheme commitments are published]

PART A

**15** Please provide the **number** of policies screened during the year (*as recorded in screening reports*):

7
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**16** Please provide the **number of assessments** that were consulted upon during 2020-21:

0	Policy consultations conducted with <b>screening</b> assessment presented.
0	Policy consultations conducted <b>with an equality impact assessment (EQIA)</b> presented.
0	Consultations for an <b>EQIA</b> alone.

**17** Please provide details of the **main consultations** conducted on an assessment (as described above) or other matters relevant to the Section 75 duties:

N/A

**18** Were any screening decisions (or equivalent initial assessments of relevance) reviewed following concerns raised by consultees? (*tick one box only*)

Yes       No concerns were raised      x No       Not applicable

Please provide any details and examples:

**Arrangements for publishing the results of assessments (Model Equality Scheme Chapter 4)**

**19** Following decisions on a policy, were the results of any EQIAs published during the 2020-21 reporting period? (*tick one box only*)

Yes       No      x Not applicable

Please provide any details and examples:

**Arrangements for monitoring and publishing the results of monitoring (Model Equality Scheme Chapter 4)**

PART A

**20** From the Equality Scheme monitoring arrangements, was there an audit of existing information systems during the 2020-21 reporting period? *(tick one box only)*

- Yes  No, already taken place  
 No, scheduled to take place at a later date  Not applicable

Please provide any details:

**21** In analysing monitoring information gathered, was any action taken to change/review any policies? *(tick one box only)*

- Yes  No  Not applicable

Please provide any details and examples:

**22** Please provide any details or examples of where the monitoring of policies, during the 2020-21 reporting period, has shown changes to differential/adverse impacts previously assessed:

See response to Question 23

**23** Please provide any details or examples of monitoring that has contributed to the availability of equality and good relations information/data for service delivery planning or policy development:

The ICO has a range of mechanisms and methods for collecting information that informs policy development and performance in relation to advancing equality of opportunity (for example our Annual Track, 'Mystery Shopper' surveys, Users experience of Internet harm research and the Citizen's Reference Panel). Collecting information to help understand inequalities and the needs of staff and customers is central to the role of the new equality, diversity and inclusion structures in informing Corporate Policy.

Our most recent Annual Track survey can be accessed here <https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2021/07/ico-publishes-annual-tracking-research/>

**Staff Training (Model Equality Scheme Chapter 5)**



- 24** Please report on the activities from the training plan/programme (section 5.4 of the Model Equality Scheme) undertaken during 2020-21, and the extent to which they met the training objectives in the Equality Scheme.

ICO Staff receive training regarding their equality obligations as part of their induction. This is supported by a range of courses including 'Dignity, Diversity and Inclusion' which is designed to ensure that staff are aware of their rights and obligations in respect of equality matters and the equality principles of the work of the ICO. A total of 129 staff were trained in 2020/21.

We run a course that builds awareness of Mental Health issues and Autism Spectrum disorders. This course is designed to gain an understanding of how these often complex conditions can result in levels of distress and lead to breakdowns in communication resulting in a poor customer service experience. In 2020/2021 we trained 74 staff.

We have designed our own e-learning in collaboration with an external subject matter expert called 'Disability awareness' with a particular focus on public sector equality duties in northern Ireland and the UK.

We continue to work with our 'Healthy Minds' internal network focusing on mental health and also Wellbeing Champions within the organisation. We have engaged with subject matter experts to deliver virtual internal sessions around Loss and bereavement, Menopause at work, Sleep, World mental health day and World suicide prevention day.

During the pandemic we have continued to support the wellbeing of our staff through a virtual offer of training including Mental health for people managers, Mental health for everyone, Uncertainty and anxiety: coping in challenging times and Personal resilience. In total 48 workshops were delivered to almost 400 staff.

We also trained our managers with the skills to be able to manage their teams whilst working remotely due to Covid-19 covering what people need from leaders during this time, supporting staff wellbeing and building their own resilience

Managers receive training on employment law issues which include an equality dimension. We have also created another internal network called 'Access and Inclusion Staff Network' and they have delivered awareness sessions for staff.

We have continued our recruitment training for managers, which addresses issues such as employment law, and fair assessment decision making. This training is mandatory, and now repeated every three years. We have added this year training for managers around conducting PDR's and career banding assessments, eliminating bias through evidence based decision making. This helps to ensure that our processes are fair and focussed on selecting candidates based on their skills, knowledge and abilities.

The ICO also has access to the Civil Service e-learning portal which includes awareness training relating to a variety of protected characteristics. All staff have access to create a Civil Service e-learning account.

Staff are also supported to attend a wide range of external training courses and events, many of which have an equality dimension or targeted sessions run by representative groups of the EDI board.

- 25** Please provide **any examples** of relevant training shown to have worked well, in that participants have achieved the necessary skills and knowledge to achieve the stated objectives:

All of our training has been viewed as adding value to the organisation and the skills and experience of the individuals who have undertaken it. As in previous years, our training sessions on Mental Health issues and supporting staff wellbeing have been particularly well received, especially during the uncertainty of the pandemic.

We have coaching available for all staff by our internal network of in house coaches. During 2020/21 we trained a further 33 staff virtually in coaching as a leadership style. These staff are able to offer coaching sessions to colleagues which can help to aid individual development, including career progression.

We continue to provide training on Dignity, Diversity and Inclusion as well as Recruitment training and promoting inclusion training for managers who are involved in any decision making regarding development and reward.

## **Public Access to Information and Services (Model Equality Scheme Chapter 6)**

- 26** Please list **any examples** of where monitoring during 2020-21, across all functions, has resulted in action and improvement in relation **to access to information and services**:

With the introduction of the Equality, Diversity and Inclusion networks there has been an increase in the range and form of communication of equality related information. Information has been uploaded to the ICO intranet, ICON but important information and "Know Abouts" have also been included in the Weekly Informer. We've run staff health and well being surveys with a particular focus on Covid to gauge the feelings of staff and make adjustments to our Covid response and communications where a need is identified.

Examples of internal communications include:

- Know About – EDI Board/People Impact Assessments
- Sleep Know About (Healthy Minds – Informer)
- Know About – World Suicide Prevention Day
- Know About - A long way to go for LGBTI equality
- Menopause Know About/awareness (Informer)

## PART A

- October is Equality Month – ICON and Informer updates promoting Know Abouts launching EDI networks.
- Equality and Diversity visitor
- REACH Network statement on George Floyd, Racism and Black Lives Matter (indigo.local) – June 2020
- Wellbeing Wednesday newsletter articles following Black Lives Matters protests (10/6/20 and 17/6/20)
- 2021 – Informer email newsletter articles x 2: 'Free online seminars – Islamic perspectives on Covid-19' (12/2/21), and 'COVID/NHS Resources for BAME communities' (18/2/21).
- Black Inclusion Week
- In 2019 and 2020, we worked with REACH and shared weekly prominent people profiles on ICON for Black History Month in October.

### Reflections on Eid and Ramadan

- Eid Greetings
- Ramadan Guide

### Other REACH/EDI related events/campaigns/news

- Remembering Srebrenica
- Holocaust Memorial Day
- 2020/21 – Informer articles and blogs on Hanukkah, Passover and Ramadan.

### Mental health awareness

- Focus on men's mental health
- World Mental Health Day
- Healthy Minds Heroes – ICON and Informer
- International Day of Happiness
- Covid-19 National Day of Reflection
- Stress Awareness Month
- Eating Disorders Resources and Support
- Informer Healthy Minds on: World Kindness Day, International Stress Awareness Week, Blue Monday (Jan 20), Children's Mental Health Week.

### Pride

- Know About - A long way to go for LGBTI equality
- Asexuality-Awareness-Week
- Bi Visibility turns 20
- Informer newsletter articles on: International Day Against Homophobia, Biphobia, Interphobia & Transphobia, Pansexual Awareness Day, and Aromantic Spectrum Awareness Week.

### Women and allies

- International Women's Day

Other recent employee awareness events

- UK Equality Act Anniversary – week of ICON updates
- Safer Internet Day
- Know About – Menopause
- Administrative Professionals Day

Our communications need to be accessible to as wide a range of people as possible.

We seek to comply with the principles of inclusiveness that incorporate the provisions of the Equality Act, Northern Ireland legislative requirements, and the Welsh language requirements.

The ICO website meets AAA accessibility standards wherever possible (the government requires AA status). This means, for example, that text size can be altered and a browsealoud facility is available. This functionality has been improved in the last twelve months.

All publications are produced to accessibility standards and the corporate "Style Guide" also incorporates this good practice. For example all ICO publications:

- use sans serif fonts for core text;
- use a font size of 12 point minimum and 14 points for important information;
- maximise white space
- use a dark out of white colour scheme
- use good quality matt paper to reduce glare and the text showing through from the other side.

The ICO also trains staff to write in plain English and has produced a "Style Guide". The ICO:

- limits sentences to between 15 – 20 words;
- avoids dense block text paragraphs;
- uses line spacing between paragraph breaks;
- keeps lines left justified with a ragged right edge;
- uses bullets or numbers rather than continuous prose;
- uses fact boxes to make main point clear;
- uses images where possible to support text; and
- seeks accreditation by the 'Plain Language Commission' for key leaflets and guidance.

We do not undertake translation of all publications as a matter of course, but we will respond to individual requests in line with our Translations Policy, which can be found on our website.

Our operational procedures establish approaches both for handling customers with particular needs and making 'reasonable adjustments' as defined within equality legislation.

In relation to learning and development, flexible options are built in covering timing of events, location, format of materials and method of delivery.

The ICO also ensures that work related events, and any refreshments served there, are inclusive as possible taking particular account of religion or belief.

In addition to these long standing arrangements, the ICO has introduced 'live chat' services which enable members of the public to interact with the organisation online. This has promoted accessibility for those who may feel anxious using the telephone helpline service, or perhaps have hearing impairments which could be a barrier to using the service.

### Complaints (Model Equality Scheme Chapter 8)

- 27** How many complaints **in relation to the Equality Scheme** have been received during 2020-21?

Insert number here:

0

Please provide any details of each complaint raised and outcome:

### Section 3: Looking Forward

- 28** Please indicate when the Equality Scheme is due for review:

The Equality Scheme is due for review in 2024.

- 29** Are there areas of the Equality Scheme arrangements (screening/consultation/training) your organisation anticipates will be focused upon in the next reporting period? *(please provide details)*

The ICO will continue to develop our emerging equality forum structures.

- 30** In relation to the advice and services that the Commission offers, what **equality and good relations priorities** are anticipated over the next reporting period? *(please tick any that apply)*

Employment

PART A

- Goods, facilities and services
- Legislative changes
- Organisational changes/ new functions
- x Nothing specific, more of the same
- Other (please state):

**PART B - Section 49A of the Disability Discrimination Act 1995 (as amended) and Disability Action Plans**

**1. Number of action measures for this reporting period that have been:**

Fully achieved

Partially achieved

Not achieved

**2. Please outline below details on all actions that have been fully achieved in the reporting period.**

2 (a) Please highlight what **public life measures** have been achieved to encourage disabled people to participate in public life at National, Regional and Local levels:

Level	Public Life Action Measures	Outputs <sup>i</sup>	Outcomes / Impact <sup>ii</sup>
National <sup>iii</sup>			
Regional <sup>iv</sup>			
Local <sup>v</sup>			

2(b) What **training action measures** were achieved in this reporting period?

PART B

	Training Action Measures	Outputs	Outcome / Impact
1	Ensure staff and office holders receive training and guidance on disability equality legislation and disability awareness.	All New Staff to be trained within 6 months of starting.  All staff to be trained by March 2023 with refresher training made available as required.	
2	Awareness of Mental Health issues and Autism Spectrum disorders.	This course is designed to gain an understanding of how these often complex conditions can result in levels of distress and lead to breakdowns in communication resulting in a poor customer service experience. In 2020/2021 we trained 74 staff.	In 2020/2021 we trained 74 staff.
	Mental health for people managers, Mental health for everyone, Uncertainty and anxiety: coping in challenging times and Personal resilience..	This course looks at specific aspects of mental health	In total 48 workshops were delivered to almost 400 staff



PART B

	Training Action Measures	Outputs	Outcome / Impact
	Awareness sessions on Loss and bereavement, Menopause at work, Sleep, World mental health day and World suicide prevention day.	A focus on mental health and also Wellbeing Champions	Staff gain an understanding of mental health and benefit from guidance and support.

2(c) What Positive attitudes **action measures** in the area of **Communications** were achieved in this reporting period?

	Communications Action Measures	Outputs	Outcome / Impact
1	An extensive report on the wide range of communication initiatives are set out in question 26 above.	A wide range of initiatives as set out in question 26.	Both in the context of the current public health crisis and beyond this the wide range of staff welling communications seeks to improve staff understanding of mental health and other disability issues and to have a positive impact on health and wellbeing.
	ICO operate a policy whereby customers are supported in receiving services. This includes a range of alternative methods or forms of assistance to bridge any	This enables customers to access our services in a new way, and is of potential benefit to hearing impaired customers.	More effective service delivery

PART B

	Communications Action Measures	Outputs	Outcome / Impact
	gaps, physical, sensory or cognitive. ICO will; use our Live Chat online service for our helpline.		

2 (d) What action measures were achieved to '**encourage others**' to promote the two duties:

	Encourage others Action Measures	Outputs	Outcome / Impact
1	As part of the ICO procurement policy, we have taken decisions that have ensured that contractors are not awarded work if there is not an effective equality and diversity plan in place	Organisations who do not take account of appropriate equality measures are not awarded contracts.	Organisations improve and update their practice as a result.
2	We have encouraged other organisations to provide the information to customers in an accessible format and reminded them of their equality obligations.	The public bodies have provided information in an appropriate format.	Better customer service for affected members of the public and increased awareness of equality obligations amongst other organisations.

2 (e) Please outline **any additional action measures** that were fully achieved other than those listed in the tables above:

PART B

	Action Measures fully implemented (other than Training and specific public life measures)	Outputs	Outcomes / Impact
1	<p>a. Survey data will be analysed, published and used as a basis for policy development and customer service improvement.</p> <p>b. Results will be published</p>	<p>Annual track can be found here <a href="https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2021/07/ico-publishes-annual-tracking-research/">https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2021/07/ico-publishes-annual-tracking-research/</a></p>	<p>Data to inform policy and service development.</p>
2	<p>Continue the implementation of the Disability Confident Standard for prospective interviewees and review this on an annual basis</p>	<p>Measures in place for all recruitment</p>	<p>Guaranteed interviews for disabled job applicants who meet the minimum criteria for the job.</p> <p>Annual review and informed policy development.</p>
	<p>Make available to all staff four factsheets, called 'Doing the duty, 'What is a disability?', 'Useful Equality and Diversity websites' and 'Top tips on how to behave around people with a disability'. We will also have produced a Dyslexia style guide – 'Communicating to someone with Dyslexia'</p>	<p>All fact sheets were published on the ICO intranet</p>	<p>These factsheets reflect the ICO's obligations under the Disability Discrimination Act, define what a disability is, illustrate some of the disability models the ICO uses, provides a list of useful equality and diversity websites for staff to view and top tips on how to behave around people with a disability.</p>
	<p>Design and develop a Well-being strategy (in conjunction with the ICO's Network for Equality and</p>	<p>A strategy is under implementation based on three wellbeing goals</p> <p>1. Healthy workplaces</p>	<p>An environment where staff are valued and their health and wellbeing is fully supported.</p>

PART B

	Action Measures fully implemented (other than Training and specific public life measures)	Outputs	Outcomes / Impact
	Inclusion) which aims to support staff to be well at work.	2. Healthy minds 3. Healthy lifestyles	

3. Please outline what action measures have been **partly achieved** as follows:

	Action Measures partly achieved	Milestones/ Outputs	Outcomes/Impacts	Reasons not fully achieved
1	N/a			
2				

PART B

4. Please outline what action measures **have not been achieved** and the reasons why.

	Action Measures not met	Reasons
1	n/a	
2		

5. What **monitoring tools** have been put in place to evaluate the degree to which actions have been effective / develop new opportunities for action?

(a) Qualitative

n/a

(b) Quantitative

n/a

6. As a result of monitoring progress against actions has your organisation either:

- made any **revisions** to your plan during the reporting period or
- taken any **additional steps** to meet the disability duties which were **not outlined in your original** disability action plan / any other changes?

Please select

If yes please outline below: The ICO has developed a new Disability Action Plan and have submitted this to the Equality Commission. The first years progress in implementing the new plan is set out in this report.

PART B

	Revised/Additional Action Measures	Performance Indicator	Timescale
1	n/a		
2			
3			
4			
5			

7. Do you intend to make any further **revisions to your plan** in light of your organisation’s annual review of the plan? If so, please outline proposed changes?

no

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<sup>i</sup> **Outputs** – defined as act of producing, amount of something produced over a period, processes undertaken to implement the action measure e.g. Undertook 10 training sessions with 100 people at customer service level.

<sup>ii</sup> **Outcome / Impact** – what specifically and tangibly has changed in making progress towards the duties? What impact can directly be attributed to taking this action? Indicate the results of undertaking this action e.g. Evaluation indicating a tangible shift in attitudes before and after training.

<sup>iii</sup> **National** : Situations where people can influence policy at a high impact level e.g. Public Appointments

<sup>iv</sup> **Regional**: Situations where people can influence policy decision making at a middle impact level

<sup>v</sup> **Local** : Situations where people can influence policy decision making at lower impact level e.g. one off consultations, local fora.