

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, 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

Please provide your name.

Answer: LM

What is the title of this piece of work? Please try to ensure that this is likely to be understandable to everyone in the ICO.

Answer: PACE Framework project

Briefly describe the overall purpose of this work.

Answer: The aim of the project is to iteratively embed a new PACE way of working into the organisation over a three year period, increasing the maturity of the new function over that time.

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

Answer: Yes

*If you answer **No** to this question, you may not need to complete an 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

Answer: No

*If you answer **No** to this question, you may not need to complete an 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? | Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact? |
|----------------------------------|---|---|
| <p>Religion or belief</p> | <p>It is anticipated that the introduction of a PACE function (new mode of working) will have a positive impact for all staff at the ICO irrespective of individual religion or belief. The PACE function will ensure the equal opportunity is given to all staff of PACE projects.</p> <p>While the new function may generate some uncertainty for those who may be involved in PACE projects this may not foster an environment where people feel safe to talk about their beliefs immediately.</p> <p>Mitigation: A TWOW (or other appropriate document) will be completed by the appropriate person within the new function to ensure that it is inclusive of, and incorporates, all the religions and beliefs in the team. Where adjustments are required for individuals due to religious reasons, such as flexible working or not attending meetings during prayer time, this will be accommodated as much as possible and factored into TWOW.</p> | <p>Whilst mitigation actions are anticipated to reduce some uncertainty it is not possible to say if it will mitigate all of the negative impacts. Staff uncertainty would be monitored throughout the project lifecycle and managed.</p> |

| Protected characteristic | Is there likely to be a specific impact on people with this characteristic? | Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact? |
|--|---|--|
| | <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed, including the anonymisation of our application.</p> | |
| <p>Race, nationality or cultural background</p> | <p>Neutral: We do not anticipate there being a positive or negative impact on anyone due to their race, nationality or cultural background.</p> <p>There will continue to be single sex spaces, as well as unisex options available, preserving the dignity of those who may feel uncomfortable.</p> <p>Flexibility will be considered in terms of working patterns where possible to ensure inclusivity for all groups.</p> <p>The ICO has a supportive and inclusive culture, sensitive to regional language and the terminology used which may cause offence and ensuring that people are able to identify as their appropriate race or cultural background. This is embedded across the organisation and so a change in reporting</p> | <p>No impact</p> |

| Protected characteristic | Is there likely to be a specific impact on people with this characteristic? | Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact? |
|---------------------------------|---|---|
| | <p>lines or Executive Directorate should not have a detrimental impact.</p> <p>If anyone did feel impacted, it would be investigated appropriately and in line with ICO policies and procedures.</p> <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed, including the anonymisation of our applications.</p> | |
| Disabled people | <p>Neutral: We do not anticipate there being a positive or negative impact on anyone due to their disability or impairment.</p> <p>A PACE function will ensure equal opportunity is given to all staff through Accessibility by Design to ensure inclusivity.</p> | No impact |
| Sexual orientation | <p>Neutral: We do not anticipate there being a positive or negative impact on anyone due to their sexual orientation.</p> | No impact |

| Protected characteristic | Is there likely to be a specific impact on people with this characteristic? | Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact? |
|---|--|--|
| | A PACE function will ensure equal opportunity is given to all staff irrespective of their sexual orientation. | |
| Sex (see note 1) | <p>Neutral: We do not anticipate there being a positive or negative impact due to an individual being male, female or other gender identity.</p> <p>A PACE function will ensure equal opportunity is given to all staff irrespective of their sex.</p> | No impact |
| Age | <p>Neutral: We do not anticipate there being a positive or negative impact due to an individual's age.</p> <p>A PACE function will ensure equal opportunity is given to all staff irrespective of their age.</p> | No impact |
| Gender reassignment (see note 2) | <p>Neutral: We do not anticipate there being a positive or negative impact due to individuals' gender reassignment.</p> <p>A PACE function will ensure equal opportunity is given to all staff irrespective of being</p> | No impact |

| Protected characteristic | Is there likely to be a specific impact on people with this characteristic? | Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact? |
|--------------------------------|--|--|
| | transgender or undergoing gender reassignment. | |
| Marital status | <p>Neutral: We do not anticipate there being a positive or negative impact due to individuals' marital status.</p> <p>A PACE function will ensure equal opportunity is given to all staff irrespective their marital status.</p> | No impact |
| Pregnancy and maternity | <p>Neutral: We do not anticipate there being a positive or negative impact due to individuals' pregnancy or maternity status.</p> <p>A PACE function will ensure equal opportunity is given to all staff irrespective their pregnancy or maternity status.</p> | No impact |
| Political opinions | Neutral: We do not anticipate there being a positive or negative impact due to individuals' political opinion as it is not a factor in its effective operation. | No impact |
| People with dependants | Neutral: We do not anticipate there being a positive or negative impact due to individuals with dependants. | No impact |

| Protected characteristic | Is there likely to be a specific impact on people with this characteristic? | Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact? |
|---|--|---|
| | <p>There are policies and frameworks that will allow individuals to work in a flexible, hybrid way, that may positively support those with family and childcare commitments.</p> <p>A PACE function will ensure equal opportunity is given to all staff irrespective their responsibilities to dependants.</p> | |
| People without dependants | <p>Neutral: We do not anticipate there being a positive or negative impact due to individuals without dependants.</p> <p>A PACE function will ensure equal opportunity is given to all staff irrespective their non-dependants status.</p> | No impact |
| Socio-economic groups or social classes (see note 3) | <p>Neutral: We do not anticipate there being a positive or negative impact due to individuals' socio-economic group or social class.</p> <p>A PACE function will ensure equal opportunity is given to all staff irrespective their socio-economic group or social class.</p> | No impact |

| Protected characteristic | Is there likely to be a specific impact on people with this characteristic? | Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact? |
|--|---|--|
| Multiple protected characteristics (see note 4) | <p>Neutral: We do not anticipate there being a positive or negative impact due to individuals' multiple protected characteristics.</p> <p>A PACE function will ensure equal opportunity is given to all staff irrespective their having multiple protected characteristics.</p> | 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.

Note 2: you may wish to consider the impact on transgender people while considering people undergoing gender reassignment, although gender is not a protected characteristic under the Equality Act

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's Welsh Regional Office has a statutory requirement to provide services through the medium of the Welsh language. Will there be a requirement for this work to include a Welsh-language element?

Please answer Yes, No or Don't Know

Answer: No

If you answer **Yes or Don't Know** to this question, you will need to contact the Welsh Regional Office to discuss next steps.

Contributing towards the ICO's equality objectives

Q5. 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: Spreading knowledge and taking action: We will raise awareness of information rights across the community and take action to ensure that organisations fulfil their obligations. We will have particular focus on groups and sectors where knowledge gaps may cause information rights inequalities or vulnerabilities. We will ensure that in our actions as a regulator we do not create inequalities or discriminate. | <p>Introduction of the new PACE portfolio is an internal way of working and so it is not considered that there is a direct contribution to this objective.</p> <p>The new PACE function will however promote a more efficient way of working where the aim is to achieve outcomes faster. This may therefore indirectly contribute to raising awareness of information rights.</p> |
| Objective 2: 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. | <p>We will ensure that staff involved in PACE projects are educated and trained on any new processes which will improve their capability, in turn supporting this objective both internally and externally to the users/customers of PACE projects.</p> <p>Processes, tools, products and platforms will be reviewed continually to ensure they are accessible for all users.</p> |

| Objective | Contribution to objective |
|---|---|
| Objective 3: 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. | No contribution. |
| Objective 4: Employer: Our workplaces and practices will be accessible, flexible, fair and inclusive. We will value the diversity, skills, backgrounds and experience of our people, enabling them to perform to their best in a welcoming and supportive environment. | It is anticipated that the introduction of the PACE portfolio will contribute to this objective by ensuring that equal opportunity is given to all staff involved in PACE projects. |

Monitoring and evaluation

Q6. What arrangements are in place, or will be put in place, to monitor and evaluate the impact of the work on equality?

Answer: Once the PACE project delivery framework has been implemented the project team will work with the Head of PACE and relevant Product Owners to understand any negative or positive impact on protected groups. This will be measured once PACE projects are 'up and running' and we can tangibly review impact.

Q7. How long will these arrangements be in place?

Answer: Equality impact will be continually reviewed by the Head of PACE during the lifecycle of the portfolio.

Q8. 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: This EQIA was drafted during phase 1 of the PACE design project. The project manager and project sponsor will review it during phase 2, once PACE projects have been commissioned.

Publication

Q9. 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: No redactions identified.

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: LM
Date: 3 April 23

Approved by line manager:

Signed by: AL
Date: 3 April 23

At each of their meetings, the EDI Board will receive a summary of the PEIAs which have been completed over the previous six weeks. However, the role of the EDI Board is **not** review and approval of PEIAs, rather overall assurance that the PEIA process is operating effectively.

For the actions which you have identified, you must complete a PEIA action plan, which you can access at [this link](#).

If you have identified that there are any negative impacts to any protected characteristics that you cannot fully mitigate (so that despite your best efforts, there will still be a negative impact to people with that protected characteristic), you must contact HR for advice.

Please send your completed form to corporategovernance@ico.org.uk for storage and publication.