Annual Equality Information Publication

2024: A snap shot as at 31 December 2023

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Part 1: Introduction to the ICO and this report

1.1 About the ICO

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.

Our increasingly digital society and economy are built on trillions of uses and exchanges of personal and public information every day.

Information can drive everything in our lives: from our healthcare to our job opportunities, or the decisions made for and about us. Upholding our information rights and seizing the opportunities of innovative information use has therefore never been more important.

Information rights isn't about processing and protecting data. It's about people - relationships, trust, equality, democracy and dignity. Organisations play a crucial role in shaping our attitudes to information use. We need to trust that our information rights will be respected if we are to confidently use the products and services provided by organisations which power our economy and society.

The ICO exists to empower you through information:

- We empower you as a member of the public to confidently contribute to a thriving society and sustainable economy.
- We empower your organisation to confidently plan, invest, innovate and grow.
- We empower you by promoting openness and transparency by public bodies.
- We empower you to hold us to account for the difference we make when enforcing the laws we oversee.

A significant part of our role is to be responsible for the enforcement of the Data Protection Act, Freedom of Information Act, the Privacy and Electronic Communications Regulations and the Environmental Information Regulations.

The **Data Protection Act 2018** gives citizens important rights, including the right to know what information is held about them and the right to correct information that is wrong. It helps to protect the interests of individuals by obliging organisations to manage the information they hold securely, and gives the ICO the power to take enforcement action organisations who mismanage or abuse personal data.

The **Freedom of Information Act 2000** gives people a general right of access to information held by 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** provide an additional means of access for people who want environmental information. The regulations cover more organisations than the Freedom of Information Act, including some private sector bodies.

The **Privacy and Electronic Communications Regulations 2003** support the Data Protection Act by regulating the use of electronic communications used for the purpose of marketing to individuals and organisations.

The ICO also has responsibilities for other regulations including aspects of the INSPIRE regulations, the Re-Use of Public Sector Information Regulations, and the Electronic Identification and Trust Services for Electronic Transactions Regulations.

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.

1.2 About this report

The ICO is a public authority and is subject to the Public Sector Equality Duty. This means that the ICO is required to publish information to demonstrate what we have done to help eliminate unlawful discrimination, advance equality of opportunity and foster good relations between people. We are also obliged to publish equality data concerning our staffing.

These obligations are called 'specific duties' of the Equality Act 2010. This report is written to fulfil those duties and to help people and organisations assess the ICO's performance with a focus on equality matters during 2023.

We want to continually improve our equality performance. We hope that the report demonstrates that equality is integral to our activities, decision making and the effective promotion of information rights.

1.3 Our Equality Objectives 2023-28

The ICO is committed to enhancing equality and diversity in all of our work. We want to be an effective and accessible regulator, service provider and employer.

To help focus our activities to achieve this, we reviewed our Equality Objectives and published these in 2023. This is also part of our obligations as a public authority arising from the Equality Act 2010.

In the period from 2023 to 2028, the ICO commits to take actions to achieve the objectives outlined below:

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 the most effective and have the greatest impact when we are representative and consider different perspectives.

Our culture will be inclusive:

We're at our best when we support and look out for one another, and when we trust and empower each other to be ourselves. That applies whether it's within the workplace or in the work that we do. We have measures in place to support our diverse workforce, such as reasonable adjustments. However, we will do more to remove the barriers that are preventing people from developing and progressing.

We will better understand the needs of everyone to deliver services that are accessible to all

We target our regulatory interventions on the areas of greatest harm and to make a real difference to people's lives. Technological innovation by businesses means the landscape we regulate is constantly transforming. We know we're at our best when we understand the needs of all our customers, including those who experience vulnerability and communities of unmet need.

1.4 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.

1.5 Equality, Diversity and Inclusion Board, Steering Group and EDI Network Groups

To help us monitor our progress towards fulfilling our Equality Objectives, we have an Equality, Diversity and Inclusion (EDI) Board, Steering Group and EDI networks.

EDI Board

The EDI Board continues to oversee the ICO's efforts to provide an increasingly accessible service for our customers and inclusive workplace for our staff.
The board is there to provide technical input, support, challenge and overview. Bringing together senior colleagues from across the organisation to do so. Many of the members additionally chair of attend sub-groups supporting further collaboration across the organisation, working to progress our EDI Objectives and the work of our Inclusive value.

During 2023/24 the ICO's EDI Board have focused on:

• Consulting with the EDI Steering Group and staff networks
• Working towards year one of our EDI Action Plan
• Inclusion and wellbeing training
• EDI data, insights and impact.
• People policies
• Our corporate voice.

EDI Steering Group and staff networks

Our current Equality and Diversity Steering Group is made up of representatives from across the ICO. Members bring with them a range of experiences, as well as their insight into both operational and strategic matters. They help to advise upon equality issues and raise awareness throughout the organisation.

The six staff networks are as follows:

- **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.

- **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.
- **Menopause** focused on supporting colleagues who experience symptoms of menopause to manage and support them in their careers, as well as signposting services that can offer additional support.
- **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.
- **REACH** (race, ethnicity and cultural heritage) network covered race, ethnicity, and cultural heritage. This network focuses on raising awareness of these issues at the ICO and in the wider community and celebrating diversity.
- **Women's** focused on gender equality. This network aims to encourage, empower and support women in their careers at the ICO and beyond.

The networks represent the interests, views and insights of various groups of people including those with protected characteristics. All staff are able to participate in a network if they wish, regardless of grade or their department.

As we continue to mainstream EDI into our wider ICO culture, our staff networks also create and facilitate events around awareness days throughout the year. Whilst sharing stories through regular blog features and the introduction of guest speakers.

The EDI Steering Group and Staff Networks provide support and expertise, but it is important that they are not regarded as the main 'owner' for equality initiatives. We wish to embed equality and diversity in the operational work of the ICO with local accountability resting with relevant departmental and project / activity leads, with involvement from staff across the organisation.

This enables the network groups to feedback and help us to improve the connection of our diversity groups to strategic decision making.

1.6 Report structure

The next part of this report provides information about the ICO's staffing including the demographics of our staff and pay equality data.

We also provide information about the training provided to our staff which helps them to provide better services to the public.

The final part of this report provides more detailed information about actions which have impacted upon our performance on equalities, diversity and good relations.

Part 2 Data and Analysis

Equality Information and the duty

This part of this report provides statistical information about the characteristics of our staff.

Data therefore reflects information as at 31 December 2023.

2.1 Total Headcount and FTE (established staff)

The ICO had 1107 employees, which represents a full-time equivalent staffing of 1051.2 posts.

Since March 2019 the ICO headcount has grown by 53% while the FTE has grown by 55%.

Headcount, FTE and growth since 2014
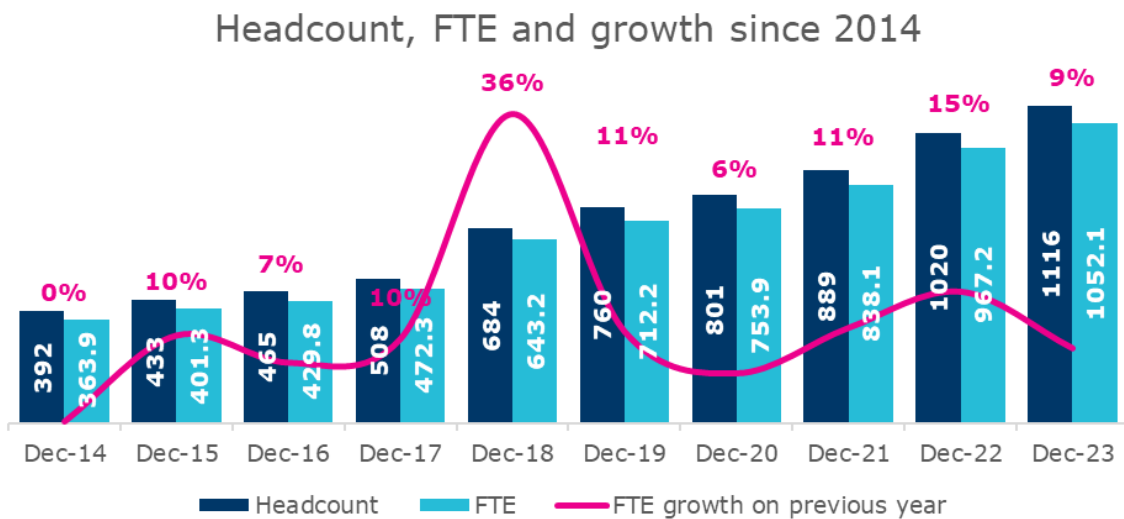
2.2 Gender Analysis

Breakdown of ICO headcount by gender
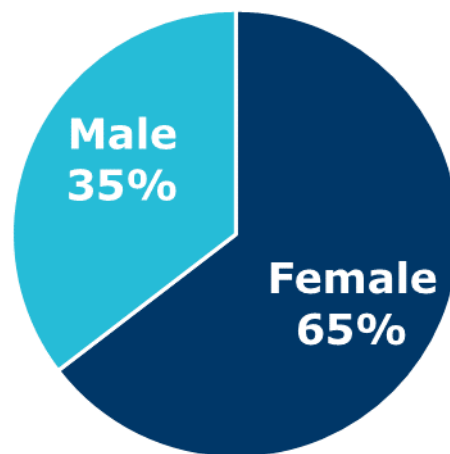
2.3   Staffing by grade

Grade	Headcount	% of ICO
Level B	25	2%
Level C	195	18%
Level D	276	25%
Level E	291	26%
Level F	210	19%
Level G	74	7%
Level G2	27	2%
Level H*	9	1%

Volume of staff at each grade and the % of the ICO each grade makes up
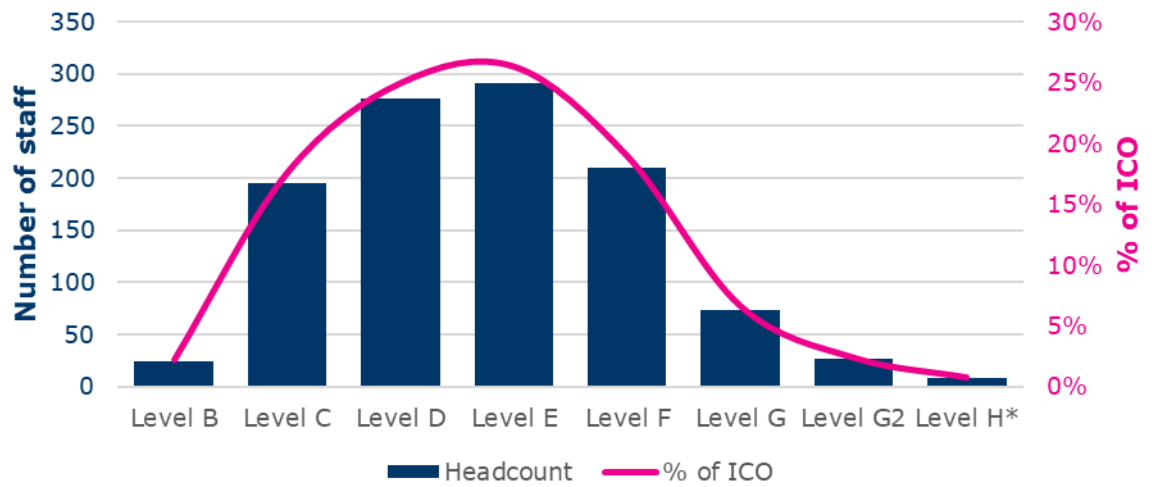
* Level H is the ICO's most senior grade. The data does not include the Commissioner as he is not an employee of the ICO.

2.4 Grade breakdown by gender

Grade	Female	Male
Level B	64%	36%
Level C	71%	29%
Level D	67%	33%
Level E	63%	37%
Level F	60%	40%
Level G	59%	41%
Level G2	63%	37%
Level H*	56%	44%

Breakdown of grade at the ICO by gender
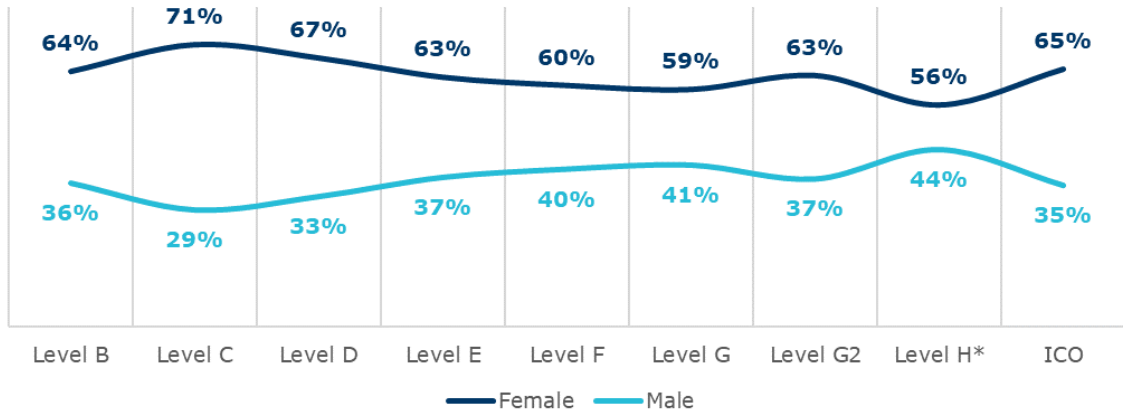
	Level B	Level C	Level D	Level E	Level F	Level G	Level G2	Level H*	ICO
Female	64%	71%	67%	63%	60%	59%	63%	56%	65%
Male	36%	29%	33%	37%	40%	41%	37%	44%	35%

* Level H is the ICO's most senior grade. The data does not include the Commissioner as he is not an employee of the ICO.

2.5 Staff by age group

Age group	% of ICO 2022	% of ICO 2023
16-19	0%	0%
20-29	17%	19%
30-39	29%	30%
40-49	26%	24%
50-59	21%	20%
60+	7%	7%

% of staff in each age group

7%
19%
20%
24%
30%

■ 16-19 ■ 20-29 ■ 30-39 ■ 40-49 ■ 50-59 ■ 60+
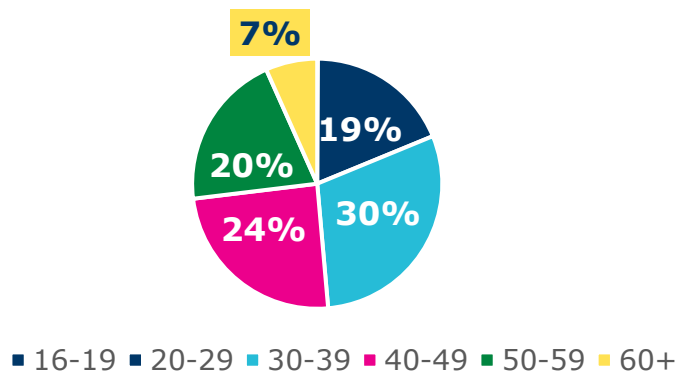
2.6 Staff by ethnic origin
The information in the table is based on information held on the HR database.

Ethnic background	Number of staff	% of ICO staff		% of Cheshire East population	2021 Census (England and Wales)
Asian & Asian British	43	3.9%		2.4%	9.3%
Black and Black British	22	2.0%		0.6%	4.0%
Chinese*	3	0.3%		-	-%
Mixed ethnicity	27	2.4%		1.8%	2.9%
Other ethnicity	2	0.2%		0.8%	2.1%
White (British, English, Irish, Scottish, Welsh)	865	78.1%		94.4%	74.4%
White (other white backgrounds)*	47	4.2%		-	6.2%
No data provided/ prefer not to say*	98	8.9%		-	-

* Current published census information provides 5 high level ethnicity categories. Some data will be included in other categories.

2.7 Staffing and disability

In 2023 the ICO introduced a new HR system. Previously staff were only able to record a positive declaration if they considered themselves to have a disability. The new system allows for a greater depth of data collection however all staff are required to provide this data. There is a continued effort to encourage staff to provide their disability information.

At 31 December 2023, 37% of staff had provided this data. Of those, 27% had disclosed they have a disability.

	Headcount	% of ICO

People with a disability	105	9%
People who are not disabled	278	25%
Prefer not to say	22	2%
Not data provided	702	63%

2.8 Other demographic information regarding protected characteristics

The ICO routinely gathers other demographic information from staff regarding characteristics, for example sexual orientation, gender identity and religion or belief.

We will continue to update our Equality Information and encourage staff to keep their information up to date.

2.9 Work patterns

The ICO operates a system of flexible working hours which allows people to start and finish at a time that suits them and their needs.
There are currently 204 staff at the ICO who work part time. This represents around 18% of the workforce.

There are 47 staff who work 'compressed hours' which allows them to work their contracted hours in fewer working days e.g. 37 hours in 4 days, or 74 hours in 9 days. Of these staff 43 are full time and 6 are part time.

In total there are 54 different contractual work patterns worked by ICO staff.

Staff can apply to change their working hours for any reasons, including the care of children or dependents. The

ICO has a procedure for dealing with such requests to ensure that they are handled fairly.

2.10 Career breaks

The ICO allows staff to apply for a career break once they have completed two years of service.

Career breaks can be taken for a number of reasons, including, personal development or study, travel, a break for the care and upbringing of children or the care of an adult dependent.

2.11 Home working

All ICO staff have an office base either at our Head Office in Wilmslow or in one of our regional offices around the UK. All ICO staff are able to combine working from home and in the office. Hybrid working is not compulsory, staff have the option to work in the office if they prefer.

All staff have access to a laptop which enables home working to be as flexible as possible and can suit any home environment.

Whilst staff are required to dedicate themselves to their work whilst they are at home, our homeworking provisions can help staff in a number of ways. For example, the removal of the need to commute every day may allow someone to be closer to child/dependent care provision and allow an earlier pick up.

2.12 Reasonable adjustments

We aim to ensure that our policies, procedures and work environment are inclusive by design. When developing new systems of work, we take due regard for equality considerations.

However, to ensure that we can make suitable arrangements if things are not suitable for the needs of all individuals, the ICO has 'reasonable adjustment' policies for customers and staff.

The ICO Service Charter policy is used to enable our customers, including those with a disability, to utilise the ICO's services if the standard processes prevent access making reasonable adjustments where required.

The staff Accessibility and Reasonable Adjustment at work policy states how the ICO will make reasonable adjustments to work content, hours or the work environment to allow a member of staff with a disability or impairment to work effectively, or to allow a member of staff who has or develops a disability to remain in work. The ICO also makes adjustments for people who have short term health conditions, to enable them to return to, or remain in, work.

The ICO regularly makes adjustments to work patterns, the work environment or equipment to allow staff to continue to work. The organisation uses the advice of occupational health whenever appropriate.

The Inclusion and Wellbeing Team (which sits within People Services) have a record of reasonable adjustments made for staff, haveheld discussions with those who have adjustments and conduct regular check ins with staff who have reasonable adjustments to ensure that the support they have is suitable for them.   Where further support needs have been identified, additional provisions have been put in place.

2.13 Equal Pay Analysis

The ICO has eight pay grades, from job Levels B through to H, with Level B being the most junior position.
Our pay system is designed to be fair and reflect the performance of individuals within their jobs.

Almost all new staff start on the Entry Rate for their pay grade, and pay awards are made each year in line with government policy and following discussions with our trade unions. Pay arrangements will also allow staff to progress their salary as their competence, contribution and impact develops.

Staff who are promoted receive an increase of a minimum increase in salary of 10%, so staff who have been in their previous grade for some time may start their new job part way up the pay range for the job into which they have been promoted.

The table below sets out the average salaries of men and women in each pay grade, along with the average time of each gender in each grade. These figures reflect the salaries paid to staff on 31 March 2023 and are those which will be reported under the gender pay gap reporting requirements.

The final column shows the percentage pay differential between the genders. A positive percentage indicates the average salary is higher for women than men, and a negative percentage shows that the average is higher for men than women.

Measure		%
1. Mean gender pay gap (Ordinary Pay)		7.6%
2. Median gender pay gap (Ordinary Pay)		7.3%
3. Mean gender pay gap (Bonus pay in the 12 months ending 31 March)		0%
4. Median pay gap (Bonus pay in the 12 months ending 31 March)		0%
5. Proportion of Male and Female employees paid a bonus in the 12 months ending 31 March	Female	97%
	Male	97%

6. Proportion of Male and Female employees in each pay quartile		
Quartile	**Female %**	**Male %**
First (Lower) quartile	69%	31.%
Second (Lower middle) quartile	65%	30%
Third (Upper middle) quartile	62%	38%
Fourth (Upper) quartile	58%	42%
Organisation	63%	37%

The average (mean) salary for women in the ICO is £40,613 (this equates to £21.11 per hour).

The average (mean) salary for men in the ICO is £43,965 (this equates to £22.85 per hour)This represents a gap of 7.6%.

The median salary for women is £35,996 (this equates to £18.71 per hour)..

The median salary for men is is £38,818 (this equates to £20.18 per hour). This represents a pay gap of 7.3%.

A further breakdown of salaries by grade and gender is provided below.

Job Level B

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	77.5%	2.5	£22,313	-0.4%
Male	22.5%	2.7	£22,231	

Job Level C

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	67.3%	1.6	£25,363	-0.8%
Male	32.7%	1.3	£25,157	

Job Level D

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	67.6%	1.9	£32,768	-1.0%
Male	32.4%	1.8	£32,438	

Job Level E

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	59.7%	3.0	£42,904	0.2%
Male	40.3%	3.3	£42,978	

Job Level F

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	61.7%	2.7	£56,225	0.4%
Male	38.3%	2.5	£56,442	

Job Level G

	Proportion of staff	Average time in	Average pay	Average female vs

		grade (years)		average male salary
Female	49.2%	1.5	£70,476	3.7%
Male	50.8%	2.1	£73,156	

Job Level G2

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	61.9%	1.9	£92,649	0.8%
Male	47.4%	2.1	£93,394	

Job Level H

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	50.0%	1.3	£112,047	15.7%
Male	50.0%	2.1	£132,948	

Part 3: Information on services, policies and other functions:

This section of the report is concerned with the services, policies and practices of the ICO and how, through the provision of those functions, we have endeavoured to meet our obligations under the Equality Act and enhance equality of opportunity in society.

It is not intended to provide an exhaustive list of every action or activity that we take which helps to further equality of opportunity. Rather, this section of the report will provide an overview of how the ICO contributes to a more equal society, particularly through our remit as the regulator of information rights.

Where helpful, we provide illustrative examples of the types of activity that are being delivered within key business areas.

3.1 Our strategic goals

We continue to undertake activity to achieve the vision we set out when we launched our ICO25 Plan. The plan sets out:

- why our work is important;
- what we want to be known for and by whom; and
- how we intend to achieve this by 2025.

In doing so, it describes our purpose, objectives and values and the shift in approach we aim to achieve through the life of this plan.

Our purpose is to empower through information.

We have set ourselves four enduring objectives which explain what we will do to make sure our work is focused on delivering our purpose.

Our enduring objectives guide what we will do, as well as what we will not do. They also show how we will allocate our resources to support the delivery of each objective.

Objective one: Safeguard and empower people
Particularly the most vulnerable, by upholding our information rights and enabling us all to confidently contribute to a thriving society and sustainable economy.

Objective two: Empower responsible innovation and sustainable economic growth

By providing regulatory certainty about what the law requires, reducing the cost of compliance and clarifying what we will do if things go wrong. This enables those we regulate to confidently plan, invest and innovate with confidence.

Objective three: Promote openness, transparency and accountability

Supporting the development of a modern Freedom of Information Act (FOIA) and Environmental Information Regulations (EIR) practice framework in the UK, inspiring confidence in public services and democracy.

Objective four: Driven by our values, we'll continuously develop the ICO's culture, capability and capacity.

Our high-performance strategy, values and behaviours outline our ambitions for equality, diversity and inclusion (EDI). It guides the development of our culture, capability and capacity for the next five years, through to 2028. It reaches beyond our ICO25 strategy, supporting the implementation of our target operating model. Our EDI objectives outline our intent and key priorities to enable our ambitions and cover three areas. They are supported by our EDI action plan.

3.2 Progress against our EDI Action Plan

The action plan details what we will deliver, by when, who is responsible for delivery and how we will know we have achieved our objectives.

Whilst we acknowledge that there is still some way to go, we can demonstrate progress and actions we've taken. In 2023/24, we have:

Objective 1: We will represent the communities and societies we serve

• Taken action to better understand our workforce demographics and taking steps to ensure we are recruiting, retaining and promoting the best talent by identifying and removing any potential barriers impacting particular groups. Specifically:
o Identified and removed any potential barriers during recruitment impacting particular groups:
o We looked at the gender diversity of our Digital Data and Technology (DDAT) team and recognised that only 17% of those working in the Directorate were female. That compared to about 62% across the ICO as a whole. To address the gender disparity, we used a bias de-coder tool to highlight gendered words and help identify unintentional gender bias in job adverts. We know that male-coded words can reduce the number of female applicants, so these were replaced with female-coded alternatives. We also reviewed our advertising channels and looked at the diversity of the recruitment panels. This resulted in the percentage of women in DDAT increasing to 33%. We acknowledge that we have more work to do to consistently embed this approach through all recruitment activity. We want to build on the successes achieved in DDAT and we now advertise on job boards that target specific groups such as: individuals from the LGBT+

Community, from ethnic minority backgrounds and those who have a disability.

o   In addition to looking at where we recruit, we have also made changes to our application requirements. We have removed the requirement to hold a university degree from the vast majority of roles - removing unnecessary barriers to jobs. We also provide interview themes to all candidates ahead of time which means candidates who are neurodiverse have time to prepare for the interview. The process respects candidate wellbeing and time and is a small step towards reducing any inherent biases in the selection process because those with cognitive accessibility needs do not need to request for a reasonable adjustment.

Objective 2: Our culture will be inclusive

•   Continued to take action to embed EDI as a golden thread across all policies and frameworks. Specifically:

o   We have continued to look at our policies and identify areas where groups were underrepresented which led to the creation of a menopause policy. We know how important it is that colleagues experiencing the menopause feel supported and through our policy, we now have a framework that encourages people to have open discussions about how perimenopause and menopause related symptoms may be affecting both their physical and mental health.

o   Additionally, we also developed a Trans policy which provides support and guidance for individuals who wish to, have taken, or are intending to take steps to present themselves as a gender different to that registered at birth and those who identify as gender non-conforming (non-binary). The policy also provides guidance for People Managers supporting colleagues who are transitioning or have transitioned and supports our commitment to inclusivity and equity for all employees.

o   Embedded a mandatory requirement for all colleagues to have a specific objective in their Performance Development

Review (PDR) that reflects the role they can play in the delivery of this objective.

• Focussed on developing the capability of our leaders. Specifically: 88% of people managers have completed our learning module 'Promoting Inclusion for People Managers'. To build on our commitment to inclusivity we have also invested in developing the EDI capability and knowledge of our senior leaders. Working with an external organisation, we delivered EDI training to our senior leaders and Non-Executive Directors. The training focussed on what EDI means in the workplace, how it can and should be applied in roles and how to actively build an inclusive environment.

• Continued to develop our reasonable adjustments process to make sure it is embedded at every stage of the employee lifecycle. Specifically:

o Strengthening the governance of the Workplace Accessibility Group established as part of the launch of our Reasonable Adjustments Policy. Being inclusive by design was a key objective for us when creating the Workplace Accessibility Group. This group brings together key service providers (members from DDAT, Inclusion and Wellbeing, Facilities, Health and Safety and Procurement) on a monthly basis to work collaboratively and quickly to identify barriers to accessibility and fix issues in a timely way for our colleagues.

o Through the work of this group, we have amended the internal procurement process to include Equality Impact Assessment (EqIA) reminders, ensuring EDI impact is considered in the start of procuring new products or systems. We have also worked with our landlords at offices to increase the accessibility of the building. In doing so, we have made changes to the doors, lighting sensors in bathrooms, printer heights and the timing on keycard access. All of these factors are now taken into consideration in future office moves. Our DDaT team has been able to provide recommendations for alternative software options. The DDaT team's prior knowledge of what the ICO has approved (in terms of software) has reduced the procurement waiting times and

enabled quicker implementation of some software adjustments.

• Continued to work collaboratively with our EDI networks and EDI Board on an awareness raising disclosure campaign to encourage and improve self-id data collection, focussing on understanding the barriers that may prevent colleagues from disclosing personal information and taking action to address those, such as seeking to raise awareness among colleagues through targeted internal comms on why it is important that we gather this data.

Objective 3: We will better understand the needs of everyone to deliver services that are accessible to all

• Through our work, we are continuing to focus on ensuring that our workforce represents the communities and societies we serve and that we understand the needs of those diverse communities Specifically:

o Developed our research and insight to understand the needs of the diverse communities we serve.

- The ICO has undertaken a number of specific projects to improve our insight to understand the needs of the diverse communities we serve.

- We are working closely with 3rd sector support organisations to better understand how we can improve our customer services for individuals who have experienced a breach of their personal information and who may be in a vulnerable situation. We are working closely with those who have experienced a breach of their HIV status, and those who are domestic violence survivors through focus groups and 1:1 interviews to gather this insight, and will take action as a result – such as the production of specific easy access information that can be pushed through specific channels, or changes to internal processes.

- Accessing personal records for individuals who have had care experience can be a complex, frustrating and time consuming process. We are working with individuals with care experience to better understand the challenges faced by

individuals and organisations, through workshops and a survey. Through the workshops, we learnt that individuals are often facing long waits to receive their information, and when it is received it may be extensively redacted, to the point of being meaningless. Individuals' information can also be held across multiple agencies – depending on their journey. We want to identify where the ICO can focus its resource to help people with care experience obtain their personal information, as well as support organisations who hold this information to provide timely responses.

- We worked with a charity, MECOPP (who support the gypsy traveller community) to produce a video outlining data protection rights and how they can be used. To better understand their needs, and how we should present the information we held a roundtable discussion with members of the community and have maintained an ongoing relationship with the charity.

3.3 Our Values

Coupled with our new organisational values, which are part of our ICO25 Strategy, we aim to enhance the services we provide to the public and stakeholders, whilst continuing to be a supportive and inclusive employer.

We are a large organisation providing a diverse range of public services – but a common thread runs through all that we do. Our four core values: curious, collaborative, impactful and inclusive are central to the way we work. They influence the way we plan, make decisions, how we behave towards one another and continually challenge ourselves to achieve our vision.

Collectively our values expect us to behave in a certain way:

Curious
We believe in continuous learning, empowering our teams to experiment and innovate and are eager for new or different perspectives to inform our work.

We are curious enough to consider new ideas and agile enough to explore them effectively.

We are curious, empathetic and actively interested in understanding all perspectives. We particularly use this to make our expectations of those we regulate as simple as possible to implement.

We regularly ask ourselves why, and why not, and seek creative opportunities and solutions to both recurring and new situations.

We challenge each other constructively, supporting each other to find the best outcome.

Collaborative
We work together in ways which enable us to prioritise, support our agility and our collective and individual high performance. This enables us to successfully execute our plans by responding to emerging risks and opportunities at pace but without sacrificing our high standards.

We move fast together so we can fix things in ways which are timely and relevant for our customers, stakeholders and colleagues.

We experiment together, learn and continuously improve. If it doesn't work, we learn from it quickly and make changes.

Impactful
We thrive on delivering at pace and with impact, by being selective to be effective. This will help us to ensure our important work makes a material difference. We take pride in our high performance.

We set clear objectives and make timely, informed decisions, using evidence and insight. We also measure and evaluate our work.

We achieve high performance by empowering people to take personal ownership and accountability. We learn from our mistakes, continuously develop and celebrate our successes.

The importance of working impartially and ethically should not be understated. The concepts of equality, diversity and inclusion are hard-wired into everything we do.

Inclusive
We want a truly equal, diverse workforce and inclusive culture. One where we respect each other and those we serve. We want diverse teams and leadership. We want stakeholder relationships that reflect our society so our organisation can thrive and perform at our very best.

We are curious to understand all perspectives, recognising the value that they bring. Our aim is for equality, diversity and inclusion to become fully embedded in all our working and thinking.

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3.4 Ensuring staff are trained in EDI

Training, both formal and informal, is a key contributor to the delivery of many aspects of the ICO Corporate and Business plan and fundamental to the delivery of the organisational equality objectives.

The ICO places considerable value in ensuring that staff receive the necessary training so that they can develop skills and understanding of their roles in line with the aims and objectives of the ICO.

There has been a significant amount of training and awareness sessions which have an equality dimension in recent years, including the following:

Assertiveness

Coaching as a leadership style

Coaching conversations

Conducting workplace investigations

Dealing with Change and Uncertainty

Developing people at the ICO

Dignity, diversity and inclusion

Disability awareness

Effective PDR's for managers

Embracing organisational change

Emotional intelligence workshop

Equality impact assessment training

Health and safety

Hiring a Diverse Workforce

How to… Give in the moment feedback

How to… Hold an effective 121 meeting

How to… Motivate your team

Inclusive leadership at the ICO

Interviewing and selection workshop

Leadership masterclass: Coaching through change

Leadership masterclass: Embedding a feedback culture

Leadership Masterclass: Inclusive Leadership and recording

Leadership masterclass: Leading change

Leading a team at the ICO

Leading through change

Menopause awareness for line managers

Assertiveness

Coaching as a leadership style

Coaching conversations

Conducting workplace investigations

Dealing with Change and Uncertainty

Developing people at the ICO

Dignity, diversity and inclusion

Disability awareness

Effective PDR's for managers

Embracing organisational change

Emotional intelligence workshop

Equality impact assessment training

Health and safety

Hiring a Diverse Workforce (DDaT) - recorded presentation

How to… Give in the moment feedback

How to… Hold an effective 121 meeting

How to… Motivate your team

Inclusive leadership at the ICO

Interviewing and selection workshop

Leadership masterclass: Coaching through change

Leadership masterclass: Embedding a feedback culture

Leadership Masterclass: Inclusive Leadership and recording

Leadership masterclass: Leading change

Leading a team at the ICO

Leading through change

Menopause awareness for line managers

Mental health first aid refresher

Mental health skills for people managers

Mentoring

Modern slavery awareness

Motivation

Peer feedback - growing a feedback culture

People Managers Conference

Personal resilience

Promoting inclusion

Promoting inclusion for people managers

Reasonable adjustment awareness for people managers

Reasonable adjustment awareness session

Reasonable Adjustments in Customer Service

Self-confidence

Supporting teams through change

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These sessions help to improve awareness of matters that affect our customers, as well as ensuring that staff are fully versed in the organisation's commitment to fairness, equality and dignity in our dealings with each other.

3.5 Monitoring and evaluating equality data.

Collecting information to help understand the needs and issues relating to the diversity of staff and customers is important when monitoring progress towards the ICO's overarching equality objectives.

The ICO collects data relating to protected characteristics which is voluntarily shared by staff, from responses to surveys, and some more limited data from customers.

Customer satisfaction surveys measure a range of issues to do with our performance and customer handling.

3.6 Ensuring that staff and customers can access information and services.

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 the text should be clear and simple to understand.

Website users should be able to:

- Zoom in up to 400% without problems;

- navigate most of the website using just a keyboard;

- navigate most of the website on different devices; and

- navigate most of the website using speech recognition software or screen readers

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.

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.

Appendix 1: Objectives and measures within the ICO High Performance Strategy that guides the development of our culture, capability and capacity which have an equality dimension

People Goal	Description
Objective one	**To ensure that all ICO team have clarity of purpose, effective leadership and harness diversity of thought and perspective to achieve their objectives.**
	• **Embed our values, shifts in approach and behaviours** **Measures:** Increase in awareness and understanding of the values, shifts in approach and behavioural framework among our colleagues, as evidences through employee engagement survey scores. Workforce diversity demographics are representative of the society by sex, disability and ethnicity. • **Build the confidence and capability of all leaders and people managers to lead, develop and coach teams by adopting inclusive and adaptive lea** **Measure:** Increase in colleagues reporting that they:

	– feel supported by their line manager; - feel they receive clear direction from their leaders; – believe they are given the opportunities and support they need to develop, continuously learn and grow; – receive regular feedback on their performance; and – as leaders, have the right knowledge and tools to influence their teams and external stakeholders. • **Ensure that all our people feel psychologically safe to contribute openly to the work of the ICO. This includes understanding what it means to create psychological safety for others and being accountable for doing so.** **Measures:** Increase in colleagues reporting that they: – feel valued for the work they do; – are respected for individual differences, ideas and working styles; and – encouraged to come up with new and better ways of doing things. Increased awareness of psychological safety. • **Embed a culture of respect and deliver our equality, diversity and inclusion objectives**

Measures: Increase in colleagues reporting that they:
 - are treated with respect at work;
 - treated equitably at work;

- are encouraged to share different views and perspectives; and
- provided with adjustments at work seamlessly

Deliver the EDI action plan within the times frames set.

Improvements in gender and ethnicity pay metrics.

Sustain positive metrics on disability pay.

Improved EqIA completion rates ahead of systems implementations and change initiatives.

Improved awareness of reasonable adjustment requirements for colleagues.

Objective two	To continuously improve through experimentation, transforming the ICO to achieve our purpose whilst empowering our people to deliver and feel accountable in their roles.
	• **Encourage diverse views in our change initiatives, listening to one another as we make decisions on how we work and what we do whilst maintaining the important momentum behind our transformation.** **Measure:** Increase in colleagues reporting that they feel empowered to share their views, that those views are listed to, and agree that the ICO is a collaborative and inclusive place to work though employee engagement survey scores.

Appendix 2: Examples equality of actions and outputs in the last year

Summary of Action Taken	Business and E&D Impact	Groups most benefitting from the action
The ICO operates the 'Disability Confident' standard of guaranteed interviews for job applicants with a disability, who meet the minimum criteria for the job.	Encourages a diversity of experience in the workforce and improves accessibility of job opportunities to people with a disability.	People with a disability
We provide a wide range of adjustments for staff, and have implemented systems for anticipating the requirements of new joiners to our organisation.	Ensuring that people with a disability (including new starters), and those with shorter term health conditions, are able to work comfortably and have the equipment and work arrangements needed to work effectively.	Staff with a disability and staff with health conditions.
We have ensured that our office spaces are accessible and have adequate facilities for staff with a disability.	Providing equal access to building facilities and improving convenience for all staff.	Staff with a disability and those with difficulties accessing facilities elsewhere in the building.

We provide learning materials in a variety of formats to meet the needs of staff undertaking training.	Ensures that all staff are able to fully access training and equally able to benefit from the desired learning outcomes.	Staff with varying learning styles, neurodiversity's or people who have disabilities such as visual impairments
We have created bespoke know abouts around reasonable adjustments in response to service user feedback	Ensures all staff have an understanding of reasonable adjustments, what they include and managerial responsibility	Staff who require workplace adjustments, including those who are neuro diverse or people with a disability.
We continue to use our Live Chat online service for our helpline. This enables customers to access our services in a new way, and is of potential benefit to hearing impaired customers.	Enables customers to contact via a wider range of methods and improves accessibility of our services.	All customers who have difficulties with, or prefer not to have, telephone interactions.
We make adjustments, using our Reasonable Adjustments policy, to the way we provide services to customers who are otherwise unable to access our services.	Improvements to the services to all customers and promotion of accessibility of information rights.	People with a disability and others for whom access to our services may be difficult.
We ensure any staff members who have /had reasonable adjustments in place at the office have access to the same facilities whilst working from home	Improvements to staff welfare and working environments	People with a disability, and others

		who may require working adjustments
We provide enhanced maternity, paternity, adoption and shared parental leave and pay provisions.	Supports parents with their caring responsibilities and encourages retention of experienced staff.	Parents and those with child care responsibilities.
We have delivered a variety of awareness sessions for staff, such as deaf/hearing impairment awareness; Asperger's; and autism awareness.	Improved appreciation of different disabilities and greater understanding of how the ICO can meet the needs of customers.	People with a disability
We are continuing to develop, an Age Appropriate Design Code to protect children and young people by implementing standards for information society services e.g. apps, websites, games, programmes and online community environments.	Enhancing the protection of young people on line by implementing safeguards for their personal information to be enacted by service providers.	Children, young people and their parents.
We have investigated cases concerning the disclosure of information relating to gender reassignment, ethnicity, sexual orientation and disability amongst others. Our enforcement action emphasises the importance of ensuring the security of such sensitive data.	Providing protection for people who have very sensitive personal data held by organisations. Helping to improve compliance with the law.	A range of groups across society.

We have taken enforcement action against companies who have sent millions of nuisance texts and spam emails to the public and have targeted people for scam cold calling.	Protecting the general public, particularly those in the most vulnerable groups, for example the elderly.	All of the community, but with particular benefit for the most vulnerable people.
We continue to undertake a wide range of speaking engagements covering the public, private, charity and third sectors.	Cascading good information rights practise across society.	All of the community.